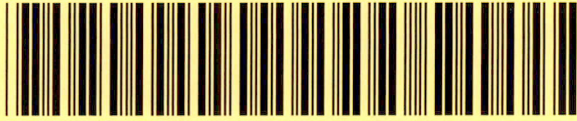


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DocumentID NONCD0002892

Site Name MERCHANTS METALS (MMI PRODUCTS)

DocumentType Correspondence (C)

RptSegment

DocDate 11/1/2012

DocRcvd 11/1/2012

Box SF3062

AccessLevel PUBLIC

Division WASTE MANAGEMENT

Section SUPERFUND

Program IHS (IHS)

DocCat FACILITY



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

CERTIFIED MAIL

7011 0110 0000 9960 7525

November 1, 2012

William R. Friedemann
MMI Products, Inc.
400 North Sam Houston Parkway East
Houston, Texas 77060

Re: **NOTICE OF REC PROGRAM ELIGIBILITY**

Merchant Metals, Inc. (MMI Products, Inc.)
165 Fanjoy Road
Statesville, Iredell County, North Carolina
IHSB # NONCD0002892

Dear Mr. Friedemann:

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Note that, if you have not already done so, you must take the initial abatement actions required under 15A NCAC 2L. Pursuant to 15A NCAC 2L .0106(b), any person conducting or controlling an activity which results in the discharge of a waste or hazardous substance to the groundwaters of the State, or in proximity thereto, shall take immediate action to terminate and control the discharge, and mitigate any hazards resulting from exposure to the pollutants. Pursuant to 15A NCAC 2L .0106(c), if groundwater standards have been exceeded, you must take immediate action to eliminate the source or sources of contamination. Beyond initial abatement actions, all assessment and remediation will be done through the Inactive Hazardous Sites Response Act (IHSRA).

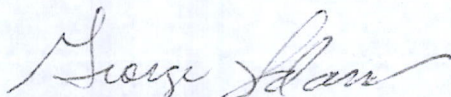
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If you have additional questions about the requirements that apply to your site, please contact me at (704) 663-1699.

Sincerely,



George D. Adams, PG & EI
Environmental Engineer II
Department of Environment and Natural Resources
Division of Waste Management
Superfund Section - Inactive Hazardous Sites Branch

Enclosure: REC-AA Procedures

cc: Stacy West
Merchant Metals, Inc.
165 Fanjoy Road
Statesville, North Carolina 28625

Celeste Mastin
MMI Products, Inc.
375 Northridge Road, Suite 500
Atlanta, Georgia 30350

Mike Burns
Environmental Services, Inc.
524 South New Hope Road
Raleigh, North Carolina 27610

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DWM IHW

NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES
MOORESVILLE REGIONAL OFFICE
610 EAST CENTER AVENUE, SUITE 301
MOORESVILLE NC 28115

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NCDENR MRO IHSB

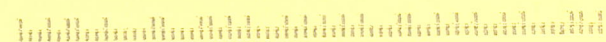
CELESTE MASLIN
MMI PRODUCTS, INC
375 NORTH ...
SUITE 500
ATLANTA



UNITED STATES POSTAGE
PITNEY BOWES
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MAILED FROM ZIP CODE 28115
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RETURN TO SENDER
ATTEMPTED - NOT KNOWN
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BC: 28115257899 *2448-07228-01-38

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North Carolina Department of Environment and Natural Resources
Division of Waste Management

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IHSB # NONCD0002892

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Sincerely,



George D. Adams, PG & EI
Environmental Engineer II
Department of Environment and Natural Resources
Division of Waste Management
Superfund Section - Inactive Hazardous Sites Branch

Enclosure: REC-AA Procedures

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165 Fanjoy Road
Statesville, North Carolina 28625

Celeste Mastin
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Atlanta, Georgia 30350

Mike Burns
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DWM IHW

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ENVIRONMENT AND NATURAL RESOURCES
MOORESVILLE REGIONAL OFFICE
610 EAST CENTER AVENUE, SUITE 301
MOORESVILLE NC 28115

CERTIFIED MAIL™



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NOV 13 2012

NCDENR MRO IHSB

WILLIAM FRIEDEMANN
MMI PRODUCTS, INC
400 NORTH SAM HOUSTON BLVD EAST
HOUSTON

NIXIE 773 SE 1 00 11/07/12
RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD
BC: 28115257899 *2448 07410-01-38

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MOORESVILLE NC 28115
610 EAST CENTER AVENUE SUITE 301
NCDENR DWM

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NCDENR DWM -IHW
610 East Center Avenue, Suite 301
Mooresville, NC 28115

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Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	5.75

WILLIAM FRIEDEMANN
 MMI PRODUCTS, INC
 400 NORTH SAM HOUSTON PKWY EAST
 HOUSTON TX 77060

IHW/GA 11/1/12

PS Form 3800, August 2006

See Reverse for Instructions



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

WILLIAM FRIEDEMANN
 MMI PRODUCTS, INC
 400 NORTH SAM HOUSTON PKWY EAST
 HOUSTON TX 77060

IHW/GA 11/1/12

2

7011 0110 0000 9960 7525

PS Form 3811, February 2004

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

102595-02-M-1540



FILE

North Carolina Department of Environment and Natural Resources
Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

CERTIFIED MAIL

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November 1, 2012

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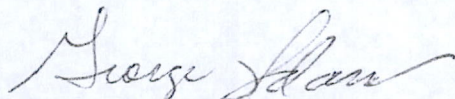
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Environmental Engineer II
Department of Environment and Natural Resources
Division of Waste Management
Superfund Section - Inactive Hazardous Sites Branch

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Adams, George

From: Adams, George
Sent: Tuesday, October 30, 2012 10:55 AM
To: 'rfriedemann@mmiproducsinc.com'
Subject: Merchants Metals NONCD0002892

Rudy,

You completed a Site Cleanup Questionnaire at our request for a Merchants Metal Facility in Statesville North Carolina. We have reviewed the data and would like to sent out an eligibility letter for a self directed assessment and/or cleanup. I have two addresses for you, 515 West Greens Road and 400 N Sam Houston Parkway East. Would you send me your current contact information?

Thanks-George

George Adams - george.adams@ncdenr.gov
North Carolina Department of Environment & Natural Resources
Division of Waste Management - Superfund Section - Inactive Hazardous Sites Branch
610 East Center Avenue, Suite 301
Mooresville, North Carolina 28115
Phone: (704) 663-1699 Fax: (704) 663-6040

Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties unless the content is exempt by statute or other regulation. Please note: my e-mail address has changed to george.adams@ncdenr.gov

Submissions of all work plans, reports, and cover letters must now include companion electronic copies on compact disc. Specific requirements including electronic file formats may be found under "[Electronic Document Submittal](#)" at the Inactive Hazardous Sites Program's website.

DIVISION OF WASTE MANAGEMENT

SUPERFUND SECTION

INACTIVE HAZARDOUS SITES BRANCH

MOORESVILLE REGIONAL OFFICE

CALL TO: Mike Burns 919-212-1760 -123

CALL FROM: George Adams -

DATE/TIME: 10-29-12 - 0920

RE: Merchants Metals

TELEPHONE LOG:

I contacted Mike and explained that I had sent several emails but I had not heard from him. I told him about the charges coming to the general stormwater permit and the REL letter. He indicated he wasn't certain they were still his client. I explained that Merchants could sign an AA with US and address both issues at the same time.

Adams, George

From: Adams, George
Sent: Tuesday, October 16, 2012 8:47 AM
To: 'Michael Burns'
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

Michael,

Please contact me at 704-663-1699 when time permits, so I may update you regarding the propose rule change and the Site's eligibility for a self directed cleanup in the REC program. Thanks-George

From: Adams, George
Sent: Tuesday, September 25, 2012 1:40 PM
To: 'Michael Burns'
Subject: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

Michael,

Just to follow up with you in this matter. From what I gather, several proposed rule changes for the general stormwater permit (that includes this facility), may address the higher priority nature of the associated IHSB Site. If you have questions or would like to discuss further, please contact me at 704-663-1699.

George Adams - george.adams@ncdenr.gov
North Carolina Department of Environment & Natural Resources
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610 East Center Avenue, Suite 301
Mooresville, North Carolina 28115
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Adams, George

From: Adams, George
Sent: Friday, September 14, 2012 5:48 PM
To: 'bradley.bennett@ncdenr.gov'
Cc: Parker, Michael
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

Bradley, can you update me regarding the individual permit for this Site? I need to follow up with the consultant. The PRP would like to continue with a self directed cleanup.

From: Adams, George
Sent: Tuesday, July 24, 2012 11:06 AM
To: 'bradley.bennett@ncdenr.gov'
Subject: FW: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

Bradley,

Constituents (primarily Zinc) have been detected in stormwater water runoff in sampling events at the facility listed below that aren't currently part of the General Stormwater Permit (NCG030000).

Merchant Metals
165 Fanjoy Road
Statesville, Iredell
NCG030379

Zinc has been detected in stormwater at concentrations that exceed 2B in consecutive sampling events, by several orders of magnitude. Although the groundwater at the facility may also be impacted, the primary contribution of Zinc to the stormwater appears to be from the facility's surface water runoff. Sediment from the drainage swales that convey the stormwater also appear to contain Zinc concentrations in excess of EPA screening levels.

We referred this facility to DWQ-MRO in February 2012 and staff here subsequently inspected the facility. We also requested repeat stormwater sampling and forwarded those results. I understand that the facility's general permit is in the process of being renewed.

Do you know who I can speak with in your permitting unit about including zinc and possibly chromium and cadmium monitoring in a individual permit for this facility? I'll try to call you after lunch – Thanks, George

From: Adams, George
Sent: Monday, June 18, 2012 9:13 AM
To: Parker, Michael
Subject: FW: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379

Please find the attached.

From: Michael Burns [mailto:mburns@ESINC.CC]
Sent: Monday, June 18, 2012 8:57 AM
To: Adams, George
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

George,

Merchants Metals forwarded these sample results to me. They did not perform turbidity measurements or record visual observations of the samples. They did analyze the samples for TSS.



Mike Burns

524 S. New Hope Road | Raleigh, NC 27610
919-212-1760 ext. 123 Phone | 919-212-1707 Fax | 919-801-4687 Cell

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From: Adams, George [mailto:george.adams@ncdenr.gov]
Sent: Tuesday, June 12, 2012 2:42 PM
To: Michael Burns
Subject: Merchants Metals NONCD0002892 / NCD980710602

Mike,

Please let me know when time permits if the storm water samples have been collected? Thanks--George

George Adams - george.adams@ncdenr.gov
North Carolina Department of Environment & Natural Resources
Division of Waste Management - Superfund Section - Inactive Hazardous Sites Branch
610 East Center Avenue, Suite 301
Mooresville, North Carolina 28115
Phone: (704) 663-1699 Fax: (704) 663-6040

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Submissions of all work plans, reports, and cover letters must now include companion electronic copies on compact disc. Specific requirements including electronic file formats may be found under "[Electronic Document Submittal](#)" at the Inactive Hazardous Sites Program's website.

Adams, George

From: Adams, George
Sent: Tuesday, September 25, 2012 1:40 PM
To: 'Michael Burns'
Subject: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

Michael,

Just to follow up with you in this matter. From what I gather, several proposed rule changes for the general stormwater permit (that includes this facility), may address the higher priority nature of the associated IHSB Site. If you have questions or would like to discuss further, please contact me at 704-663-1699.

George Adams - george.adams@ncdenr.gov
North Carolina Department of Environment & Natural Resources
Division of Waste Management - Superfund Section - Inactive Hazardous Sites Branch
610 East Center Avenue, Suite 301
Mooresville, North Carolina 28115
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Adams, George

From: Pickle, Ken
Sent: Thursday, September 20, 2012 9:35 AM
To: Adams, George
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

Thanks, George.

Ken

Ken Pickle
Environmental Engineer
NCDENR | DWQ | Stormwater Permitting Unit
1617 Mail Service Center, Raleigh, NC 27699-1617
512 N. Salisbury St, Raleigh, NC 27604

Phone: (919) 807-6376
Fax: (919) 807-6494
Email: ken.pickle@ncdenr.gov
Website: <http://portal.ncdenr.org/web/wq/ws/su>

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From: Adams, George
Sent: Thursday, September 20, 2012 9:25 AM
To: Pickle, Ken
Cc: Lowther, Brian; Georgoulas, Bethany; Bennett, Bradley; Parker, Michael
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

Ken, thanks for the follow up. I noticed there was a draft revision to the general permit out for public comment. Please let us know if there is any way we can support the proposed rule change.

From: Pickle, Ken
Sent: Wednesday, September 19, 2012 1:54 PM
To: Parker, Michael; Adams, George
Cc: Lowther, Brian; Georgoulas, Bethany; Bennett, Bradley
Subject: FW: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

Hi Mike, Hi George,

OK, here's what we in SPU think would address the issues at Merchants Metals (NCG030379) from a stormwater permitting standpoint. (If we clearly don't understand something about the circumstances, let me know.)

As it happens, their current coverage under the General Permit NCG03 is about to expire on October 31. The current version of that permit only requires metals monitoring for Pb. SPU has published a Draft revision to NCG03 that is out for public comment now. Our revised Draft expands the metals monitoring to include Cu, Pb, and Zn. This new permit will be effective Nov. 1, 2012 (i.e., in 6 weeks.)

If the Draft permit comes through the public comment period with Cu, Pb, and Zn still included (and we expect it will), then it looks like we would not need to push these folks into an individual permit. We could just renew their current coverage, and the new Zn benchmark of 67 ug/L would, over a relatively short period, push these folks into stormwater control responses to bring their very high Zn values down to the relatively low benchmark value. Or, if that low level is

not feasibly achievable, DWQ MRO would have the tool in hand (our permit benchmark and Tiered structure) to reach whatever feasible response action makes sense on the ground. To us, this is the administrative path that seems sufficient to protect the aquatic environment, and easier to implement (i.e., fewer painful bureaucrat-manhours invested by SPU), than rescinding their current coverage and processing an individual stormwater permit application.

- We think this approach is sufficient on the following bases:
 - The parameter that seems to be most problematic is Zn, and we have now included that parameter in the Draft General Permit NCG03;
 - The single exceedance reported for Pb is still important, but it would appear to no longer be the main driver for cleanup of the stormwater discharge;
 - While the presence of Cd is not addressed directly by the revised Draft General Permit text, we suspect that addressing the Zn is the more significant issue at this site, and that addressing the Zn will very likely address the Cd, too. That is, we believe it is likely that the two pollutants will respond similarly to any treatment/source control measures.
- Mike, if you have made progress, or communicated with these folks in another direction, let me know about it, please. *We can work it out together if you see another/better path forward for them.*
- Mike, do you see that we need to take any other action now, other than renew their coverage under a revised and expanded NCG03 at the end of October?
- You can read through the string of emails below to see our thinking on the flip-flop from an individual permit over to the new revised General Permit NCG03, if you wish. But, I've already captured the bones of our rationale above.

Best Regards,
Ken

Ken Pickle
Environmental Engineer
NCDENR | DWQ | Stormwater Permitting Unit
1617 Mail Service Center, Raleigh, NC 27699-1617
512 N. Salisbury St, Raleigh, NC 27604

Phone: (919) 807-6376
Fax: (919) 807-6494
Email: ken.pickle@ncdenr.gov
Website: <http://portal.ncdenr.org/web/wq/ws/su>

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From: Bennett, Bradley
Sent: Wednesday, September 19, 2012 12:44 PM
To: Pickle, Ken
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

Thanks Ken!

Bradley Bennett
Stormwater Permitting Unit
NC Division of Water Quality
1617 Mail Service Center
Raleigh, NC 27699-1617

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|
|

Phone: (919) 807-6378
Fax: (919) 807-6494
Email: bradley.bennett@ncdenr.gov
Web: <http://portal.ncdenr.org/web/wq/ws/su>

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From: Pickle, Ken
Sent: Wednesday, September 19, 2012 11:29 AM
To: Bennett, Bradley; Georgoulas, Bethany
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

BB, BG

It sounds like we know how we want to address this.

If you'd like, I'll take over management of the contact with MRO, DWM, and the permittee(if?).

- First action: **let MP and George know** where we are on this question wrt the appropriate permit coverage.
- Second action: **find out what DENR** has told the permittee on this question: adjust subsequent actions accordingly
- Presumed third action: As BB suggests, **wait for NCG03** to be final.
- Presumed fourth: determined by the above to achieve appropriate coverage.

kbp

Ken Pickle
Environmental Engineer
NCDENR | DWQ | Stormwater Permitting Unit
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From: Bennett, Bradley
Sent: Wednesday, September 19, 2012 11:20 AM
To: Georgoulas, Bethany; Pickle, Ken
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

I think we will probably have to communicate with them in some way because Mike may have included info about an individual permit in his inspection report. We may still be able to do that by sending them a separate letter with their renewal. I guess we really have to wait until the comment period is up and we know about the monitoring for sure.

BB

Bradley Bennett

Stormwater Permitting Unit
NC Division of Water Quality
1617 Mail Service Center
Raleigh, NC 27699-1617

|
|
|
|

Phone: (919) 807-6378
Fax: (919) 807-6494
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Web: <http://portal.ncdenr.org/web/wq/ws/su>

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From: Georgoulas, Bethany
Sent: Wednesday, September 19, 2012 11:17 AM
To: Pickle, Ken; Bennett, Bradley
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

Sounds like a plan.

What do we need to do? Do we still need to write a letter like we said we would, or just communicate with George Adams and Mike Parker?

-Bg

Bethany Georgoulas
Environmental Engineer
NCDENR | DWQ | Stormwater Permitting Unit
1617 Mail Service Center, Raleigh, NC 27699-1617
512 N. Salisbury St, Raleigh, NC 27604
Phone: (919) 807-6372
Fax: (919) 807-6494
NEW Website: <http://portal.ncdenr.org/web/wq/ws/su>

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From: Pickle, Ken
Sent: Wednesday, September 19, 2012 8:57 AM
To: Bennett, Bradley; Georgoulas, Bethany
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

Ah, yes, I missed the fact that Cu and Zn will be added to NCG03, if the draft goes through unchanged in that regard. With that additional info, I think that NCG03 is good enough for the questions on Merchant.

- Once they institute some sort of improved controls on Zn, I think we will get removal of the Cd along with it. It's my vague expectation that the two metals are sufficiently similar in properties as to be co-removed.

I concur with just using NCG03, 2012 version to address .

ken

Ken Pickle
Environmental Engineer
NCDENR | DWQ | Stormwater Permitting Unit
1617 Mail Service Center, Raleigh, NC 27699-1617
512 N. Salisbury St, Raleigh, NC 27604

Phone: (919) 807-6376
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From: Bennett, Bradley
Sent: Tuesday, September 18, 2012 2:48 PM
To: Georgoulas, Bethany; Pickle, Ken
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

Good thoughts guys. Lets try and talk about this tomorrow. At this point I'm leaning towards just leaving them in the GP since Zn may be added.

BB

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From: Georgoulas, Bethany
Sent: Tuesday, September 18, 2012 1:26 PM
To: Pickle, Ken; Bennett, Bradley
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

That's a reasonable approach. Although, note that the proposed NCG03 includes zinc monitoring. Another reason to wait until NCG03 GP is renewed until directing them on what to do.

We could request they begin cadmium monitoring as they prepare their individual application (*but I just saw your note on that, Ken – you're right, the lower value is trout waters*); they would have to sample and report potential constituents in Form 2F anyway.

Because Zn may go into the general permit, they may not need an individual permit unless we are concerned about other metals. If we do go the IP route, I'd recommend giving them three months to apply; I think that's plenty of time, given that we've been in this conversation since this summer. -Bg

Bethany Georgoulas
Environmental Engineer
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From: Pickle, Ken
Sent: Tuesday, September 18, 2012 1:02 PM
To: Bennett, Bradley
Cc: Georgoulas, Bethany
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

Bradley,

See my comments inserted below.

kbp

Ken Pickle

Environmental Engineer
NCDENR | DWQ | Stormwater Permitting Unit
1617 Mail Service Center, Raleigh, NC 27699-1617
512 N. Salisbury St, Raleigh, NC 27604

Phone: (919) 807-6376
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Website: <http://portal.ncdenr.org/web/wq/ws/su>

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From: Bennett, Bradley
Sent: Tuesday, September 18, 2012 11:11 AM
To: Pickle, Ken
Subject: FW: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

Hey Ken,

I think you had talked with Mike about this one back when George (DWM) noted the issues.

That's right.

Mike asked me about this one today after we got another email from George. Do you think we have everything we need to send a letter telling them to send an individual application?

I think we have enough to trigger an individual permit:

- *Primarily on the basis of Zn, not monitored for under NCG03:*
 - *DWQ 2B Action Level (not strictly applicable?) of 50ug/L and DWQ Stormwater benchmark of 67 ug/L: Eight site measurements from 2 events at 4 outfalls averaged 1324 ug/L, with a high value of 3710 ug/L.*
 - *Zn is one of the 'ubiquitous' metals.*
- *Cadmium has a WQS of 0.4 ug/L, but four measurements from the site reported 0.51, 0.61, 1.11, and 0.71; all four in excess of the WQS, but only one in excess of the stormwater benchmark of 1.0 ug/L. But, close enough to make us interested in the parameter, I think. The first thing to do is to require a method that will get down to below the WQS value, without the J flag.*
- *The interest of the Haz Waste guys is for me another reason for us to want to monitor this site for these two metals not captured by NCG03.*

Also note that 2H.0127(i) that you cited when this discussion was on-going in July says, in part:

"Reasons for requiring application for an individual permit may be:

- (1) The discharge is a significant contributor of pollutants; ? Well, maybe. If challenged, I don't know the definition of 'significant contributor'. But, it does seem like the metals are scary, and should be addressed to protect/reclaim the receiving water. I think this is our basis for going forward. We will need to state in the letter to the permittee that this is our basis for requiring an individual permit.*
- (2) Conditions change....such that the discharge no longer qualifies for coverage under the general permit; X- Not applicable*
- (3) Noncompliance with the general permit; X – Not applicable*

- (4) *Noncompliance with Division rules; ? Maybe somewhere in our rules there is a general catch-all that would apply here, but I can't call it to mind.*
- (5) *A change has occurred in the availability of demonstrated technology.....; X – Not applicable*
- (6) *Effluent limitations are promulgated.....; X – Not applicable*
- (7) *A water quality management plan containing requirements applicable.....; X – Not applicable*
- (8) *A determination that the water of the stream receiving the discharge is not meeting applicable water quality standards." X – Not applicable*

Maybe we could do that as part of their NCG03 renewal?

Yes, we could pull it from the stack, make a special letter, and go ahead and issue their NCG03 COC for some very short interim period, maybe? Enough time to put together an EPA Form 1 and 2F, and submit it to us. Set up the COC for six months? Less? That would be one way. Probably other ways, too, would make sense.

BB

Bradley Bennett
Stormwater Permitting Unit
NC Division of Water Quality
1617 Mail Service Center
Raleigh, NC 27699-1617

| Phone: (919) 807-6378
| Fax: (919) 807-6494
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| Web: <http://portal.ncdenr.org/web/wq/ws/su>

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From: Adams, George
Sent: Friday, September 14, 2012 5:49 PM
To: Bennett, Bradley
Cc: Parker, Michael
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

Bradley, can you update me regarding the individual permit for this Site? I need to follow up with the consultant. The PRP would like to continue with a self directed cleanup.

From: Adams, George
Sent: Tuesday, July 24, 2012 11:06 AM
To: 'bradley.bennett@ncdenr.gov'
Subject: FW: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000

Bradley,

Constituents (primarily Zinc) have been detected in stormwater water runoff in sampling events at the facility listed below that aren't currently part of the General Stormwater Permit (NCG030000).

Merchant Metals
165 Fanjoy Road
Statesville, Iredell
NCG030379

Zinc has been detected in stormwater at concentrations that exceed 28 in consecutive sampling events, by several orders of magnitude. Although the groundwater at the facility may also be impacted, the primary contribution of Zinc to the stormwater appears to be from the facility's surface water runoff. Sediment from the drainage swales that convey the stormwater also appear to contain Zinc concentrations in excess of EPA screening levels.

We referred this facility to DWQ-MRO in February 2012 and staff here subsequently inspected the facility. We also requested repeat stormwater sampling and forwarded those results. I understand that the facility's general permit is in the process of being renewed.

Do you know who I can speak with in your permitting unit about including zinc and possibly chromium and cadmium monitoring in a individual permit for this facility? I'll try to call you after lunch – Thanks, George

From: Adams, George
Sent: Monday, June 18, 2012 9:13 AM
To: Parker, Michael
Subject: FW: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379

Please find the attached.

From: Michael Burns [<mailto:mburns@ESINC.CC>]
Sent: Monday, June 18, 2012 8:57 AM
To: Adams, George
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

George,

Merchants Metals forwarded these sample results to me. They did not perform turbidity measurements or record visual observations of the samples. They did analyze the samples for TSS.



Mike Burns
524 S. New Hope Road | Raleigh, NC 27610
919-212-1760 ext. 123 Phone | 919-212-1707 Fax | 919-801-4687 Cell

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From: Adams, George [<mailto:george.adams@ncdenr.gov>]
Sent: Tuesday, June 12, 2012 2:42 PM
To: Michael Burns
Subject: Merchants Metals NONCD0002892 / NCD980710602

Mike,

Please let me know when time permits if the storm water samples have been collected? Thanks--George

George Adams - george.adams@ncdenr.gov
North Carolina Department of Environment & Natural Resources
Division of Waste Management - Superfund Section - Inactive Hazardous Sites Branch
610 East Center Avenue, Suite 301

Mooreville, North Carolina 28115
Phone: (704) 663-1699 Fax: (704) 663-6040

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DIVISION OF WASTE MANAGEMENT

SUPERFUND SECTION

INACTIVE HAZARDOUS SITES BRANCH

MOORESVILLE REGIONAL OFFICE

CALL TO: George Adams

CALL FROM: Mike Burns -

DATE/TIME: 8-6-12 - 1600

RE: Merchant Metals -

TELEPHONE LOG:

1600 => Mike left a message for a return call.

1615 => I returned his call. Explained the status of the proposed change to the permit ~~to~~ (DWQ). I told him that w/o a change, I would not be able to issue an REC eligibility letter. He would on his own at his client's behalf - request an individual permit for the facility, which would include monitoring for Zn. I gave him Ken Pickett's number => 919-807-6376

Adams, George

From: Adams, George
Sent: Monday, August 06, 2012 3:59 PM
To: 'Michael Burns'
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

Call me at 704-663-1699 and I will give you an update.

From: Michael Burns [mailto:mburns@ESINC.CC]
Sent: Monday, August 06, 2012 3:43 PM
To: Adams, George
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

George,

Can you please provide me with a status of this project when you get the opportunity. I'm not being pushed by my client, just trying to get an idea of where you are in the process.



Mike Burns
524 S. New Hope Road | Raleigh, NC 27610
919-212-1760 ext. 123 Phone | 919-212-1707 Fax | 919-801-4687 Cell

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From: Adams, George [mailto:george.adams@ncdenr.gov]
Sent: Monday, June 18, 2012 9:30 AM
To: Michael Burns
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

I believe there is a rule of thumb relationship between TSS and NTU that many chemists use, so I will try to keep that in mind. Thank you for the data, this was helpful.

From: Michael Burns [mailto:mburns@ESINC.CC]
Sent: Monday, June 18, 2012 8:57 AM
To: Adams, George
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

George,

Merchants Metals forwarded these sample results to me. They did not perform turbidity measurements or record visual observations of the samples. They did analyze the samples for TSS.



Mike Burns
524 S. New Hope Road | Raleigh, NC 27610

919-212-1760 ext. 123 Phone | 919-212-1707 Fax | 919-801-4687 Cell

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Sent: Tuesday, June 12, 2012 2:42 PM
To: Michael Burns
Subject: Merchants Metals NONCD0002892 / NCD980710602

Mike,

Please let me know when time permits if the storm water samples have been collected? Thanks--George

George Adams - george.adams@ncdenr.gov
North Carolina Department of Environment & Natural Resources
Division of Waste Management - Superfund Section - Inactive Hazardous Sites Branch
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Mooresville, North Carolina 28115
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Adams, George

From: Adams, George
Sent: Tuesday, July 24, 2012 11:06 AM
To: 'bradley.bennett@ncdenr.gov'
Subject: FW: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379 / NCG030000
Attachments: MMI 5-9-12 results.doc; sample locations.pdf; Merchants Metals GW & Stream Add Rpt 10-4-2011.pdf

Bradley,

Constituents (primarily Zinc) have been detected in stormwater water runoff in sampling events at the facility listed below that aren't currently part of the General Stormwater Permit (NCG030000).

Merchant Metals
165 Fanjoy Road
Statesville, Iredell
NCG030379

Zinc has been detected in stormwater at concentrations that exceed 2B in consecutive sampling events, by several orders of magnitude. Although the groundwater at the facility may also be impacted, the primary contribution of Zinc to the stormwater appears to be from the facility's surface water runoff. Sediment from the drainage swales that convey the stormwater also appear to contain Zinc concentrations in excess of EPA screening levels.

We referred this facility to DWQ-MRO in February 2012 and staff here subsequently inspected the facility. We also requested repeat stormwater sampling and forwarded those results. I understand that the facility's general permit is in the process of being renewed.

Do you know who I can speak with in your permitting unit about including zinc and possibly chromium and cadmium monitoring in a individual permit for this facility? I'll try to call you after lunch – Thanks, George

From: Adams, George
Sent: Monday, June 18, 2012 9:13 AM
To: Parker, Michael
Subject: FW: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379

Please find the attached.

From: Michael Burns [mailto:mburns@ESINC.CC]
Sent: Monday, June 18, 2012 8:57 AM
To: Adams, George
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George,

Merchants Metals forwarded these sample results to me. They did not perform turbidity measurements or record visual observations of the samples. They did analyze the samples for TSS.



**ENVIRONMENTAL
SERVICES, INC.**
Mike Burns
524 S. New Hope Road | Raleigh, NC 27610

919-212-1760 ext. 123 Phone | 919-212-1707 Fax | 919-801-4687 Cell

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From: Adams, George [mailto:george.adams@ncdenr.gov]
Sent: Tuesday, June 12, 2012 2:42 PM
To: Michael Burns
Subject: Merchants Metals NONCD0002892 / NCD980710602

Mike,

Please let me know when time permits if the storm water samples have been collected? Thanks--George

George Adams - george.adams@ncdenr.gov
North Carolina Department of Environment & Natural Resources
Division of Waste Management - Superfund Section - Inactive Hazardous Sites Branch
610 East Center Avenue, Suite 301
Mooresville, North Carolina 28115
Phone: (704) 663-1699 Fax: (704) 663-6040

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Submissions of all work plans, reports, and cover letters must now include companion electronic copies on compact disc. Specific requirements including electronic file formats may be found under "[Electronic Document Submittal](#)" at the Inactive Hazardous Sites Program's website.

DIVISION OF WASTE MANAGEMENT

SUPERFUND SECTION

INACTIVE HAZARDOUS SITES BRANCH

MOORESVILLE REGIONAL OFFICE

CALL TO: Bradley Bennett (919) 807-6378

CALL FROM: George Adams

DATE/TIME: 7-24-12 - 1615

RE: Merchant Metals -

TELEPHONE LOG:

I discussed the data w/ Bradley and
he said he or Mike Parker would
follow up.

Adams, George

From: Adams, George
Sent: Thursday, June 14, 2012 8:10 AM
To: Parker, Michael
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

I can get the results from the consultant; he likely supplied the bottles. I was just curious if the permit writers in Raleigh had made a decision about an individual permit, etc.

From: Parker, Michael
Sent: Wednesday, June 13, 2012 8:10 AM
To: Adams, George
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

I know they supposedly collected some SW samples shortly after my visit, but the NPDES permit only requires them to send the results to Raleigh and not the RO. It takes our folks in Raleigh a while to load the sample results into our data base, so it may be a couple of months before the results are available for review. I can call the fellow I met with during my inspection if you like and have him send me the results. Let me know what you would like for me to do.

From: Adams, George
Sent: Tuesday, June 12, 2012 2:44 PM
To: Parker, Michael
Subject: FW: Merchants Metals NONCD0002892 / NCD980710602

Mr. Parker... have you heard anything from the permit writer for Merchants Metals NCG030379? I will be back in MRO on Friday.

From: Adams, George
Sent: Tuesday, June 12, 2012 2:42 PM
To: 'Michael Burns'
Subject: Merchants Metals NONCD0002892 / NCD980710602

Mike,

Please let me know when time permits if the storm water samples have been collected? Thanks--George

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Adams, George

From: Michael Burns [mburns@ESINC.CC]
Sent: Thursday, June 14, 2012 2:17 PM
To: Adams, George
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

George,

I'm trying to find out. I'll get back to you when I hear something.



Mike Burns

524 S. New Hope Road | Raleigh, NC 27610
919-212-1760 ext. 123 Phone | 919-212-1707 Fax | 919-801-4687 Cell

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From: Adams, George [mailto:george.adams@ncdenr.gov]
Sent: Tuesday, June 12, 2012 2:42 PM
To: Michael Burns
Subject: Merchants Metals NONCD0002892 / NCD980710602

Mike,

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Adams, George

From: Adams, George
Sent: Monday, June 18, 2012 9:13 AM
To: Parker, Michael
Subject: FW: Merchants Metals NONCD0002892 / NCD980710602 / NCG030379
Attachments: MMI 5-9-12 results.doc; sample locations.pdf

Please find the attached.

From: Michael Burns [mailto:mburns@ESINC.CC]
Sent: Monday, June 18, 2012 8:57 AM
To: Adams, George
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

George,

Merchants Metals forwarded these sample results to me. They did not perform turbidity measurements or record visual observations of the samples. They did analyze the samples for TSS.



Mike Burns
524 S. New Hope Road | Raleigh, NC 27610
919-212-1760 ext. 123 Phone | 919-212-1707 Fax | 919-801-4687 Cell

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Sent: Tuesday, June 12, 2012 2:42 PM
To: Michael Burns
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Mike,

Please let me know when time permits if the storm water samples have been collected? Thanks--George

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Pesticides/PCB's EPA Method 608 Parameter	Quantitation Limit (mg/L)	Outfall 1 (mg/L)	Outfall 2 (mg/L)	Outfall 3 (mg/L)	Outfall 4 (mg/L)
Aldrin	0.001	BQL	BQL	BQL	BQL
Alpha,BHC	0.001	BQL	BQL	BQL	BQL
Beta,BHC	0.001	BQL	BQL	BQL	BQL
Delta,BHC	0.001	BQL	BQL	BQL	BQL
Gamma,BHC	0.001	BQL	BQL	BQL	BQL
Chlordane	0.010	BQL	BQL	BQL	BQL
4,4'-DDD	0.001	BQL	BQL	BQL	BQL
4,4'-DDE	0.001	BQL	BQL	BQL	BQL
4,4'-DDT	0.001	BQL	BQL	BQL	BQL
Dieldrin	0.001	BQL	BQL	BQL	BQL
Endosulfan 1	0.001	BQL	BQL	BQL	BQL
Endosulfan 11	0.001	BQL	BQL	BQL	BQL
Endosulfan Sulfate	0.001	BQL	BQL	BQL	BQL
Endrin	0.001	BQL	BQL	BQL	BQL
Endrin Aldehyde	0.001	BQL	BQL	BQL	BQL
Heptachlor	0.001	BQL	BQL	BQL	BQL
Heptachlor epoxide	0.001	BQL	BQL	BQL	BQL
Methoxychlor	0.001	BQL	BQL	BQL	BQL
Toxaphene	0.020	BQL	BQL	BQL	BQL
PCB 1016	0.005	BQL	BQL	BQL	BQL
PCB 1221	0.005	BQL	BQL	BQL	BQL
PCB 1232	0.005	BQL	BQL	BQL	BQL
PCB 1242	0.005	BQL	BQL	BQL	BQL
PCB 1254	0.005	BQL	BQL	BQL	BQL
PCB 1260	0.005	BQL	BQL	BQL	BQL

Sample Number
Sample Date
Sample Time

731026
05/09/12
1415

731027
05/09/12
1425

731028
05/09/12
1410

731029
05/09/12
1420

mg/L = milligrams per Liter = parts per million (ppm)
BQL = Below Quantitation Limits

PCB = Polychlorinated Biphenyl

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Volatile Organics EPA Method 624	Quantitation Limit	Outfall 1	Outfall 2	Outfall 3	Outfall 4
<u>Parameter</u>	<u>(mg/L)</u>	<u>(mg/L)</u>	<u>(mg/L)</u>	<u>(mg/L)</u>	<u>(mg/L)</u>
Methylene Chloride	0.010	BQL	BQL	BQL	BQL
Trichlorofluoromethane	0.010	BQL	BQL	BQL	BQL
1,1-Dichloroethene	0.010	BQL	BQL	BQL	BQL
1,1-Dichloroethane	0.010	BQL	BQL	BQL	BQL
Chloroform	0.010	BQL	BQL	BQL	BQL
Carbon Tetrachloride	0.010	BQL	BQL	BQL	BQL
1,2-Dichloropropane	0.010	BQL	BQL	BQL	BQL
Trichloroethene	0.010	BQL	BQL	BQL	BQL
Dibromochloromethane	0.010	BQL	BQL	BQL	BQL
1,1,2-Trichloroethane	0.010	BQL	BQL	BQL	BQL
Tetrachloroethene	0.010	BQL	BQL	BQL	BQL
Chlorobenzene	0.010	BQL	BQL	BQL	BQL
Trans-1,2-Dichloroethene	0.010	BQL	BQL	BQL	BQL
1,2-Dichloroethane	0.010	BQL	BQL	BQL	BQL
1,1,1-Trichloroethane	0.010	BQL	BQL	BQL	BQL
Bromodichloromethane	0.010	BQL	BQL	BQL	BQL
Cis-1,3-Dichloropropene	0.010	BQL	BQL	BQL	BQL
Benzene	0.010	BQL	BQL	BQL	BQL
Trans-1,3-Dichloropropene	0.010	BQL	BQL	BQL	BQL
Bromoform	0.010	BQL	BQL	BQL	BQL
1,1,2,2-Tetrachloroethane	0.010	BQL	BQL	BQL	BQL
Toluene	0.010	BQL	BQL	BQL	BQL
Ethyl Benzene	0.010	BQL	BQL	BQL	BQL
Chloromethane	0.010	BQL	BQL	BQL	BQL
Bromomethane	0.010	BQL	BQL	BQL	BQL
Vinyl Chloride	0.010	BQL	BQL	BQL	BQL
Chloroethane	0.010	BQL	BQL	BQL	BQL
Total Xylenes	0.010	BQL	BQL	BQL	BQL
Acrolein	0.100	BQL	BQL	BQL	BQL
Acrylonitrile	0.100	BQL	BQL	BQL	BQL
2-Chloroethyl vinyl ether	0.010	BQL	BQL	BQL	BQL

Miscellaneous	Quantitation Limit	Outfall 1	Outfall 2	Outfall 3	Outfall 4
<u>Parameters</u>	<u>(mg/L)</u>	<u>(mg/L)</u>	<u>(mg/L)</u>	<u>(mg/L)</u>	<u>(mg/L)</u>
Total Oil & Grease	5.0	BQL	BQL	BQL	6.4
Total Suspended Solids (TSS)	5.0	11.0	6.67	10.0	6.0
Total Lead	0.005	BQL	BQL	BQL	BQL
Zinc	0.010	1.27	0.831	1.08	0.568

Miscellaneous	Quantitation Limit	Outfall 1	Outfall 2	Outfall 3	Outfall 4
<u>Parameters</u>	<u>(Std. Units)</u>	<u>(mg/L)</u>	<u>(mg/L)</u>	<u>(mg/L)</u>	<u>(mg/L)</u>
pH	N/A	6.50	6.36	6.32	6.75

Sample Number	731026	731027	731028	731029
Sample Date	05/09/12	05/09/12	05/09/12	05/09/12
Sample Time (hrs)	1415	1425	1410	1420

BQL = Below Quantitation Limits

mg/L = milligrams per Liter = parts per million (ppm)

Semi-volatile Organics Method 625	Quantitation Limit	Outfall 1	Outfall 2	Outfall 3	Outfall 4
Parameter	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(mg/L)
4-Chloro-3-methylphenol	0.010	BQL	BQL	BQL	BQL
2-Chlorophenol	0.010	BQL	BQL	BQL	BQL
2,4-Dichlorophenol	0.010	BQL	BQL	BQL	BQL
2,4-Dimethylphenol	0.010	BQL	BQL	BQL	BQL
2,4-Dinitrophenol	0.050	BQL	BQL	BQL	BQL
2-Methyl-4,6-dinitrophenol	0.050	BQL	BQL	BQL	BQL
2-Nitrophenol	0.010	BQL	BQL	BQL	BQL
4-Nitrophenol	0.050	BQL	BQL	BQL	BQL
Pentachlorophenol	0.050	BQL	BQL	BQL	BQL
Phenol	0.010	BQL	BQL	BQL	BQL
2,4,6-Trichlorophenol	0.010	BQL	BQL	BQL	BQL
Acenaphthene	0.010	BQL	BQL	BQL	BQL
Acenaphthylene	0.010	BQL	BQL	BQL	BQL
Anthracene	0.010	BQL	BQL	BQL	BQL
Benzidine	0.050	BQL	BQL	BQL	BQL
Benzo(a)anthracene	0.010	BQL	BQL	BQL	BQL
Benzo(a)pyrene	0.010	BQL	BQL	BQL	BQL
Benzo(b)fluoranthene	0.010	BQL	BQL	BQL	BQL
Benzo(ghi)perylene	0.010	BQL	BQL	BQL	BQL
Benzo(k)fluoranthene	0.010	BQL	BQL	BQL	BQL
Benzyl butyl phthalate	0.010	BQL	BQL	BQL	BQL
Bis(2-chloroethoxy)methane	0.010	BQL	BQL	BQL	BQL
Bis(2-chloroethoxy)ether	0.010	BQL	BQL	BQL	BQL
Bis(2-chloroisopropyl)ether	0.010	BQL	BQL	BQL	BQL
Bis(2-ethyl-hexyl)phthalate	0.010	0.002 J	BQL	0.005 J	BQL
4-Bromophenyl phenyl ether	0.010	BQL	BQL	BQL	BQL
2-Chloronaphthalene	0.010	BQL	BQL	BQL	BQL
4-Chlorophenyl phenyl ether	0.010	BQL	BQL	BQL	BQL
Chrysene	0.010	BQL	BQL	BQL	BQL
Dibenzo(a,h)anthracene	0.010	BQL	BQL	BQL	BQL
1,2-Dichlorobenzene	0.010	BQL	BQL	BQL	BQL
1,3-Dichlorobenzene	0.010	BQL	BQL	BQL	BQL
1,4-Dichlorobenzene	0.010	BQL	BQL	BQL	BQL
3,3-Dichlorobenzidine	0.020	BQL	BQL	BQL	BQL
Diethyl phthalate	0.010	BQL	BQL	BQL	BQL
Dimethyl phthalate	0.010	BQL	BQL	BQL	BQL
Di-N-Butyl phthalate	0.010	BQL	BQL	BQL	BQL
2,4-Dinitrotoluene	0.010	BQL	BQL	BQL	BQL
2,6-Dinitrotoluene	0.010	BQL	BQL	BQL	BQL
Di-N-Octyl phthalate	0.010	BQL	BQL	BQL	BQL
1,2-Diphenylhydrazine	0.050	BQL	BQL	BQL	BQL
Fluoranthene	0.010	BQL	BQL	BQL	BQL
Fluorene	0.010	BQL	BQL	BQL	BQL
Hexachlorobenzene	0.010	BQL	BQL	BQL	BQL
Hexachlorobutadiene	0.010	BQL	BQL	BQL	BQL
Hexachlorocyclopentadiene	0.010	BQL	BQL	BQL	BQL
Hexachloroethane	0.010	BQL	BQL	BQL	BQL
Indeno(1,2,3-cd) pyrene	0.010	BQL	BQL	BQL	BQL
Isophorone	0.010	BQL	BQL	BQL	BQL
Naphthalene	0.010	BQL	BQL	BQL	BQL
Nitrobenzene	0.010	BQL	BQL	BQL	BQL
N-Nitrosodimethylamine	0.010	BQL	BQL	BQL	BQL
N-nitrosodi-n-propylamine	0.010	BQL	BQL	BQL	BQL
N-Nitrosodiphenylamine	0.010	BQL	BQL	BQL	BQL
Phenanthrene	0.010	BQL	BQL	BQL	BQL
Pyrene	0.010	BQL	BQL	BQL	BQL
1,2,4-Trichlorobenzene	0.010	BQL	BQL	BQL	BQL
Dilution Factor		1	1	1	1
Sample Number		731026	731027	731028	731029
Sample Date		05/09/12	05/09/12	05/09/12	05/09/12
Sample Time (hrs)		1415	1425	1410	1420

BQL = Below Quantitation Limits

mg/L = milligrams per Liter = parts per million (ppm)

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NCDENR MRO IHSB



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JUN 18 2012

NCDENR MRO IHSB

Adams, George

From: Adams, George
Sent: Monday, June 18, 2012 9:30 AM
To: 'Michael Burns'
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

I believe there is a rule of thumb relationship between TSS and NTU that many chemists use, so I will try to keep that in mind. Thank you for the data, this was helpful.

From: Michael Burns [mailto:mburns@ESINC.CC]
Sent: Monday, June 18, 2012 8:57 AM
To: Adams, George
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

George,

Merchants Metals forwarded these sample results to me. They did not perform turbidity measurements or record visual observations of the samples. They did analyze the samples for TSS.



Mike Burns
524 S. New Hope Road | Raleigh, NC 27610
919-212-1760 ext. 123 Phone | 919-212-1707 Fax | 919-801-4687 Cell

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From: Adams, George [mailto:george.adams@ncdenr.gov]
Sent: Tuesday, June 12, 2012 2:42 PM
To: Michael Burns
Subject: Merchants Metals NONCD0002892 / NCD980710602

Mike,

Please let me know when time permits if the storm water samples have been collected? Thanks--George

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Adams, George

From: Adams, George
Sent: Monday, May 14, 2012 11:03 AM
To: 'Michael Burns'
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602
Attachments: image001.png

I'll defer to your judgment. If the NTUs aren't practical or not commonly performed, a visual observation will suffice. I appreciate your efforts.

From: Michael Burns [mailto:mburns@ESINC.CC]
Sent: Monday, May 14, 2012 10:43 AM
To: Adams, George
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

George,

The permit likely requires that they analyze the samples for total suspended solids, but I will ask that they also measure turbidity.



Mike Burns
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From: Adams, George [mailto:george.adams@ncdenr.gov]
Sent: Monday, May 14, 2012 10:36 AM
To: Michael Burns
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

Thanks Mike for the update. I'm not sure what the general permit requires or what is generally done during sampling of a precipitation events, but please ask them to either measure the NTUs of the sample or at least note the color and visual clarity (clear, slightly hazy, hazy, cloudy, turbid). That would be helpful to the IHSB.

From: Michael Burns [mailto:mburns@ESINC.CC]
Sent: Monday, May 14, 2012 9:04 AM
To: Adams, George
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

George,

Merchants Metals plans to collect samples for zinc analysis during the upcoming stormwater sampling event (next representative storm event). I'll forward the results to you as soon as I receive them.

Mike Burns



Mike Burns
524 S. New Hope Road | Raleigh, NC 27610
919-212-1760 ext. 123 Phone | 919-212-1707 Fax | 919-801-4687 Cell

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From: Adams, George [mailto:george.adams@ncdenr.gov]
Sent: Thursday, April 26, 2012 1:50 PM
To: Michael Burns
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

I'm planning to be in the office on May 1, 2012 all day until 6 pm. I apologize for the delay in speaking with you.

From: Michael Burns [mailto:mburns@ESINC.CC]
Sent: Wednesday, April 25, 2012 1:05 PM
To: Adams, George
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

George,

I understand that you're out of the office today (Wednesday) and would like to speak on Thursday, 4/26. I will be out of the office after today and don't return until 5/1. Let me know a date and time that will work for you after 4/30.



Mike Burns
524 S. New Hope Road | Raleigh, NC 27610
919-212-1760 ext. 123 Phone | 919-212-1707 Fax | 919-801-4687 Cell

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From: Adams, George [mailto:george.adams@ncdenr.gov]
Sent: Thursday, April 19, 2012 4:27 PM
To: Michael Burns
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

I'll take what non-proprietary and relevant you can send.

From: Michael Burns [mailto:mburns@ESINC.CC]
Sent: Thursday, April 19, 2012 4:25 PM
To: Adams, George
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

We do not have photos of the runoff locations. I do have photos taken during the assessment.



Mike Burns
524 S. New Hope Road | Raleigh, NC 27610
919-212-1760 ext. 123 Phone | 919-212-1707 Fax | 919-801-4687 Cell

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DIVISION OF WASTE MANAGEMENT

SUPERFUND SECTION

INACTIVE HAZARDOUS SITES BRANCH

MOORESVILLE REGIONAL OFFICE

CALL TO: George Adams

CALL FROM: Mike Burns 919-212-1760

DATE/TIME: 5-1-12 - 0930

RE: Merchants Metals -

TELEPHONE LOG:

Mike returned my call. I explained the delay had to do with the Zn loss that appears to be leaving the facility in precipitation events. The amount detected is not consistent w/ the amount noted in groundwater which indicates overland flow is a significant source. I'm waiting to see if this issue can be addressed under RCRA, and if so, it is likely that I would agree to a self directed assessment and cleanup. However it is possible that DWA will be unable to monitor and that the IHSB will provide oversight. He said the Hce tank leaked and made the Zn mobile and impact groundwater. I told him that I was requesting it, but they could consider adding Zn to the next stormwater monitoring event.

George Adams - George.Adams@ncdenr.gov

North Carolina Dept. of Environment & Natural Resources

Div. of Waste Mgt. - Superfund Section - Inactive Hazardous Sites Branch

610 E. Center Ave., Suite 301

Mooresville, NC 28115

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DIVISION OF WASTE MANAGEMENT

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INACTIVE HAZARDOUS SITES BRANCH

MOORESVILLE REGIONAL OFFICE

CALL TO: Mike Burns

CALL FROM: George Adams

DATE/TIME: 4-24-12 - 1635

RE: Merchant Metals -

TELEPHONE LOG:

1635 → I left Mike a message and requested a return call Thursday.

Land fill -

Adams, George

From: Michael Burns [mburns@ESINC.CC]
Sent: Friday, April 20, 2012 10:58 AM
To: Adams, George
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602
Attachments: image001.png; Confluence point from LF flow(orangeleft).pdf; Decon station.pdf; Labeled Drums.pdf; main flow source to stream 1.pdf; main flow source to stream 2.pdf; main flow source to stream 3.pdf; Moist micaceous clay.pdf

Attached are some photos. There will be a few more emails with photos to follow.



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Attachments: image001.png; MW1 installation (fill clay red).pdf; MW1 saturated clayey sands.pdf; MW2 Fill material (red clay shallow).pdf; MW3 install (fill clay material red).pdf; Northern property boundary offsite flow.pdf; Onsite flow from LF at northwest boundary.pdf

Second email



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Attachments: image001.png; SED2 and SW2 sample point flowing.pdf; Soft saprolite in stream base northend of prop.pdf; south and upstream of 4foot culvert.pdf; southern drain pipe break.pdf; southern drain pipe looking north.pdf; Spring west of galv shed p1.pdf

Last one.



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Adams, George

From: Adams, George
Sent: Thursday, April 26, 2012 1:50 PM
To: 'Michael Burns'
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

I'm planning to be in the office on May 1, 2012 all day until 6 pm. I apologize for the delay in speaking with you.

From: Michael Burns [mailto:mburns@ESINC.CC]
Sent: Wednesday, April 25, 2012 1:05 PM
To: Adams, George
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

George,

I understand that you're out of the office today (Wednesday) and would like to speak on Thursday, 4/26. I will be out of the office after today and don't return until 5/1. Let me know a date and time that will work for you after 4/30.



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Submissions of all work plans, reports, and cover letters must now include companion electronic copies on compact disc. Specific requirements including electronic file formats may be found under "[Electronic Document Submittal](#)" at the Inactive Hazardous Sites Program's website.

Adams, George

From: Michael Burns [mburns@ESINC.CC]
Sent: Monday, April 02, 2012 4:36 PM
To: Adams, George
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602
Attachments: RO Notes.pdf

Mr. Adams,

The CD that includes the requested reports was mailed to you today. The stormwater runoff field notes that include the turbidity data are attached. Turbidity readings were not performed for the surface water samples collected from the stream. The samples were noted to be clear and free of visible sediment.

Mike Burns



Mike Burns
524 S. New Hope Road | Raleigh, NC 27610
919-212-1760 ext. 123 Phone | 919-212-1707 Fax | 919-801-4687 Cell

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From: Adams, George [mailto:george.adams@ncdenr.gov]
Sent: Friday, March 30, 2012 10:38 AM
To: Michael Burns
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

We appreciate your efforts. Thank you. --George

From: Michael Burns [mailto:mburns@ESINC.CC]
Sent: Friday, March 30, 2012 10:21 AM
To: Adams, George
Subject: RE: Merchants Metals NONCD0002892 / NCD980710602

George,

I am in the process of putting all of the requested reports/documents onto a disk and mailing it to you. I apologize for not including that message in the email.



Mike Burns
524 S. New Hope Road | Raleigh, NC 27610
919-212-1760 ext. 123 Phone | 919-212-1707 Fax | 919-801-4687 Cell

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From: Adams, George [mailto:george.adams@ncdenr.gov]
Sent: Friday, March 30, 2012 10:13 AM
To: Michael Burns
Subject: Merchants Metals NONCD0002892 / NCD980710602

Mr. Burns,

On behalf of your client, thank you for submitting the site cleanup questionnaire for Merchant Metals, Inc. (NONCD0002892) in Statesville, Iredell County, North Carolina. In order for me to evaluate REC eligibility, I need you to provide previously requested data including (without limitation), field sampling forms for the surface water and storm water samples, all environmental assessments and reports including copies of the original reports from Terracon, and the facility's storm water plan (SW3P). Please indicate if you are unable to provide this information. The IHSB assigned ID # for this Site is NONCD0002892.

We appreciate your efforts to submit data electronically. Please apply OCR (Optical Characteristic Recognition) to all PDFs. Further information regarding Electronic Document Submittal can be found at the link below. If you have questions or need additional information, please contact me--George

George Adams - george.adams@ncdenr.gov
North Carolina Department of Environment & Natural Resources
Division of Waste Management - Superfund Section - Inactive Hazardous Sites Branch
610 East Center Avenue, Suite 301
Mooresville, North Carolina 28115
Phone: (704) 663-1699 Fax: (704) 663-6040

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ENVIRONMENTAL SERVICES, INC.
524 S. NEW HOPE ROAD
RALEIGH, NORTH CAROLINA 27610
919-212-1760 • FAX 919-212-1707
www.environmentalservicesinc.com

RECEIVED
APR 4 2012
NCDENR MRO IHSB

April 2, 2012

Mr. George Adams
NCDENR – Inactive Hazardous Sites Branch
610 East Center Avenue, Suite 301
Mooreville, NC 28117

RE Site Reports
Merchants Metals, Inc.
165 Fanjoy Road
Statesville, Iredell County, North Carolina
ESI Project ER10-125.04

NONCD0002892

Dear Mr. Adams:

Environmental Services, Inc., (ESI) on behalf of Merchants Metals, Inc. is please to submit the requested reports for the referenced site. The reports include the current Stormwater Pollution Prevention Plan; Initial Site Sampling Plan, Initial Site Sampling Report; Groundwater and Stream Assessment Report; and Groundwater and Stream Assessment Addendum. Turbidity readings were not performed for the surface water samples collected from the stream. The field notes for the surface water samples indicate that all samples were clear and free of visible sediment. Terracon's sampling data is provided in the Initial Site Sampling Plan. Terracon did not prepare any reports for the site.

If you have any questions or comments, please contact me at (919) 212-1760.

Sincerely,

ENVIRONMENTAL SERVICES, INC.



Michael J. Burns, P.G.
VP, Senior Manager
Site Assessment and Remediation

ER10-125.04

Enclosure

Adams, George

From: Adams, George
Sent: Tuesday, April 17, 2012 11:59 AM
To: 'Marcia.Allocco@ncdenr.gov'
Subject: RE: Merchants Metals NCG030379 NONCD0002892 / NCD980710602
Attachments: MM SWPPP 2012.pdf

Attached is the stormwater plan. I'm evaluating for self directed cleanup in our REC program, so I will want to talk to you about this later in the week.

From: Adams, George
Sent: Friday, February 24, 2012 12:44 PM
To: 'Marcia.Allocco@ncdenr.gov'
Cc: 'Krebs, Rob'
Subject: Merchants Metals NCG030379

Please find select assessment reports (and/or referral) for the following facility:

Merchants Metals Incorporated (aka MMI Products Inc)
165 Fanjoy Road
Statesville, Iredell, North Carolina
PCS # NCG030379 (NPDES)
RCRA # NCD980710602

at following path (why not save a tree, and we have to scan everything anyway).

G:\TEMP\Merchant Metals Inc (MMI Products Inc) IHSB # pending

Merchants Metals GW & Stream Assess Rpt 8-26-11.pdf
Merchants Metals GW & Stream Add Rpt 10-4-2011.pdf

I need access to a copy until I fill out our SPL form but if you prefer hard copies, I can give them back now. I will try to get a copy of the SW3P.

Recap: August 2011 site assessment reports elevated concentrations of metals in surface water and sediments of perennial stream adjacent to this facility. Oct 2011 site assessment reports elevated concentrations of metals in storm water from four different facility outfalls. DAQ indicated the air permit has been rescinded.

When and if you go and inspect, please let us now, and we will incorporate your data into our files. Your assistance is always invaluable and greatly appreciated. Thanks-G

George Adams - george.adams@ncdenr.gov
North Carolina Department of Environment & Natural Resources
Division of Waste Management - Superfund Section - Inactive Hazardous Sites Branch
610 East Center Avenue, Suite 301
Mooresville, North Carolina 28115
Phone: (704) 663-1699 Fax: (704) 663-6040

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Parris, Bruce

From: Proctor, Roberta
Sent: Wednesday, January 25, 2012 10:41 AM
To: Parris, Bruce
Subject: RE: Merchants Metals referral

I understand completely Bruce. It is sort of like carpentry, measure twice, cut once. Merchants Metals have been very responsive and are eager to continue the remediation. They had a tough break with their first consultant but are ready to go now. Let me know if you need anything else.

Roberta Proctor
Western Area Environmental Chemist
Hazardous Waste Section - Division of Waste Management
NC Department of Environment & Natural Resources
PO Box 384
Lake Lure, NC 28746
828-625-0171
Roberta.Proctor@ncdenr.gov

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From: Parris, Bruce
Sent: Tuesday, January 24, 2012 6:11 PM
To: Proctor, Roberta
Subject: RE: Merchants Metals referral

Thanks Roberta,
I was confused with the NCD980710602 number. I'm guessing this is just a generator number for this facility and it is not an indication that the site was permitted by the HWS. That number threw me off because it's not our inventory number and when I looked through the EPA website and the reports you sent it was not clear at all that the consultant was able to definitively identify which particular parts of the galvanizing process and chemical handling at the site had caused the detections. Just to explain why I was checking; We had another facility that was referred over to us by the HWS and we have spent a good deal of time fighting with the RP who argues that their site still falls under the HWS regulations and that we don't have any authority over them. It was a complicated situation where the contamination couldn't be "proven" to have occurred at the exact waste management unit on site, but on the flip side, it also couldn't be proven that it didn't since the closure had been based on visual indicators and the site had long usage history. I just wanted to have a good understanding of what we'll be walking into when we list the site and require them to start doing assessment and remediation under our regs.

Thanks again,
Bruce

Bruce Parris - Bruce.Parris@ncdenr.gov

Environmental Supervisor II, Western Region
North Carolina Dept. of Environment & Natural Resources
Div. of Waste Mgt. - Superfund Section - Inactive Hazardous Sites Branch
Mooresville Regional Office
610 East Center Street, Suite 301
Mooresville, NC 28115
Ph: (704) 663-1699 Fax: (704) 663-6040

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From: Proctor, Roberta
Sent: Tuesday, January 24, 2012 10:33 AM
To: Jesneck, Charlotte
Cc: Burch, Brent; Parris, Bruce
Subject: RE: Merchants Metals referral

Charlotte,
The material that was released was not a hazardous waste or from a hazardous waste unit. The site is also not
permitted site under the HW Section. The release was from the galvanizing tank which is a process tank, therefore the
contamination is a process waste, not a hazardous waste.

Roberta Proctor
Western Area Environmental Chemist
Hazardous Waste Section - Division of Waste Management
NC Department of Environment & Natural Resources
PO Box 384
Lake Lure, NC 28746
828-625-0171
Roberta.Proctor@ncdenr.gov

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disclosed to third parties unless the content is exempt by statute or other regulation.

From: Jesneck, Charlotte
Sent: Tuesday, January 24, 2012 10:25 AM
To: Proctor, Roberta
Cc: Burch, Brent; Parris, Bruce
Subject: RE: Merchants Metals referral

Just so I am clear. You mean the contamination is from a pre-1980 spill and not from a post-1980 release that was a
RCRA process waste or from a RCRA waste unit. We cannot by law work on sites permitted under RCRA

From: Proctor, Roberta
Sent: Tuesday, January 24, 2012 7:49 AM
To: Parris, Bruce
Cc: Jesneck, Charlotte; Burch, Brent
Subject: RE: Merchants Metals referral

Bruce, the contamination at the site is from both process material and material that would have been hazardous waste. It was determined by the HW section that it wasn't in the hazardous waste jurisdiction which is why it was referred to your Branch.

Roberta Proctor
Western Area Environmental Chemist
Hazardous Waste Section - Division of Waste Management
NC Department of Environment & Natural Resources
PO Box 384
Lake Lure, NC 28746
828-625-0171
Roberta.Proctor@ncdenr.gov

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From: Parris, Bruce
Sent: Friday, January 20, 2012 12:12 PM
To: Proctor, Roberta
Cc: Jesneck, Charlotte; Burch, Brent
Subject: Merchants Metals referral

Roberta,
I wanted to clarify with you the Metals Merchants site referral you sent to me. The contamination at the site, according to the reports and your note, is associated with the former galvanizing process at the site. The galvanizing process wasn't considered a hazardous waste generating procedure at this permitted site (NCD980710602)? I just want to make absolutely certain that the contamination at this permitted site/former galvanizing operation doesn't fall under the HWS regulation/oversight before we start our legal pursuit of them under the Inactive Hazardous Sites Act. Thanks for the clarification.

Bruce

Bruce Parris - Bruce.Parris@ncdenr.gov
Environmental Supervisor II, Western Region
North Carolina Dept. of Environment & Natural Resources
Div. of Waste Mgt. - Superfund Section - Inactive Hazardous Sites Branch
Mooresville Regional Office
610 East Center Street, Suite 301
Mooresville, NC 28115

Ph: (704) 663-1699 Fax: (704) 663-6040

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9/6/0011 Merchants Metals

Arrived onsite @ 845 am to
collect stormwater run of 6
samples.

Temp is 70°F, cloudy skies,
Rain is spotty and check
of RO-1, RO-2, RO-3 + RO-4
indicate no flow. Rain
began to increase at 1030 A

calibrated Hach 2100P
turbidity meter

<u>Standard</u>	<u>Reading</u>
9.31	9.35
72.2	72.0
480	480

collected RO-1 @ north
culvert. water was flowing
and clear, turbidity
9.36 NTU. Sample @
1040 AM

Collected RO-2 @ culvert
near Southern Storage
area. Water was flowing
and clear. Turbidity
reading 10.67 NTU. Sampled
at 1052 am.

Collected RO-3 off the
edge of pavement near
galvanizing building.
Water was flowing off
pavement and clear.
Turbidity reading 12.11
NTU. Sampled @ 1137 AM

Collected RO-4 from
culvert near galvanizing
building. Water was flowing
and clear. Turbidity
reading 7.68 NTU.
Sampled at 1145 AM

left site @ 130 PM.

TABLE OF CONTENTS

	<u>Page</u>
TABLE OF CONTENTS	i
TABLE OF CONTENTS	ii
1. SITE PLAN & OPERATIONS.....	1-1
1.1 Site Description	1-1
1.1.1 General Location	1-1
1.1.2 Facility Operations	1-1
1.1.3 Material Storage	1-3
1.1.4 Waste Storage and Disposal	1-6
1.1.5 Loading/Unloading Areas.....	1-7
1.1.6 Site Drainage/Stormwater Controls.....	1-7
1.2 Significant Spills.....	1-7
1.3 Non-Stormwater Certification	1-7
2. STORMWATER MANAGEMENT PLAN	2-1
2.1 Best Management Practices.....	2-1
2.2 Inspection of Stormwater Conveyances	2-2
3. PREVENTIVE MAINTENANCE AND GOOD HOUSEKEEPING	3-1
3.1 Preventive Maintenance Program.....	3-1
3.1.1 Identification of Equipment and Plant Areas to Inspect.....	3-1
3.1.2 Schedule for Preventive Maintenance Inspections.....	3-2
3.2 Good Housekeeping Program	3-2
3.2.1 Operation and Maintenance.....	3-2
3.2.2 Material Storage Practices.....	3-3
3.2.3 Material Inventory Procedures	3-3
4. POLLUTION PREVENTION TEAM.....	4-1
5. TRAINING	5-1
6. REPORTING AND RECORDKEEPING	6-1
7. FACILITY INSPECTIONS AND STORMWATER SAMPLING	7-1
7.1 Facility Inspections.....	7-1
7.2 Stormwater Sampling	7-1
8. PLAN AMENDMENT	8-1
9. FEASIBILITY STUDY	9-1
10. IMPLEMENTATION.....	10-1

TABLE OF CONTENTS

APPENDICES

Appendix A: Figures

Figure 1: Site Location Map

Figure 2: Aerial Photograph

Figure 3: Topography Map

Figure 4: Site Map

Figure 5: Surface Drainage

Figure 6: Wastewater Treatment System Diagram

Figure 7: Upper Yadkin Watershed

Appendix B: Non-stormwater Discharge Assessment and Certification

Appendix C: Pollution Prevention Team

Appendix D: Training

Appendix E: Inspections

Appendix F: Spill / Incident Report Forms

Appendix G: NPDES Permit NCG030000

1. SITE PLAN & OPERATIONS

1.1 Site Description

1.1.1 General Location

The Merchants Metals facility is located at 165 Fanjoy Road in Statesville, Iredell County, North Carolina (Figures 1 and 2). The total property is approximately 23 acres. The manufacturing areas are composed of a 55,975 square foot manufacturing main building, a secondary 9,100 square foot building, a 5,155 square foot gate shop and a 10,000 square foot polyline area. There is a paved roadway and parking lot, grass/landscaped areas, and a small undeveloped wooded parcel at the rear of the property.

The facility has a Stormwater Certificate of Coverage NCG03079 to discharge stormwater at their facility under NPDES General Permit No. NCG03000 (Appendix G). As shown on Figure 5, the plant discharges stormwater off-site through one outfall (OF-01). This outfall discharges to an unnamed tributary of Fourth Creek.

1.1.2 Facility Operations

Merchants Metals manufactures wire fencing for industrial, commercial and residential applications. The Merchants Metals facility primarily operates under Standard Industrial Classification (SIC) 3496 (Miscellaneous Fabricated Wire Products) or NAICS 332618 (Other Fabricated Wire Manufacturing). A secondary SIC code for this facility is 3479 (Coating, Engraving, and Allied Services, Not Elsewhere Classified).

Metal components are first cleaned and prepared in a multi-station washing unit. Metal fencing components, both individual pieces and fence sections, are conveyed into the first compartment of the wash unit, an alkaline cleaner wash station. This station, similar to the other stations in the wash system, has openings at either end to allow the parts to pass through it, moved by the conveyor system. The alkaline solution is sprayed on the parts as they move through the wash station. After the spray cycle, the solution drains by gravity from the wetted parts into a catch tank at the base of the station. This tank provides a reservoir for recycling the solution and feeds the spray pump. To enhance the effectiveness of the solution in the reservoir, it is heated and maintained at temperature with a natural gas fired heater.

The parts are then conveyed to a rinse spray station. The sprayed rinse water is also caught and recycled from the rinse tank, similar to the recycle setup in the alkaline spray station.

Following this rinse, the parts are conveyed to the third enclosed station for treatment using a spray of phosphate solution. The phosphate solution produces a “conversion” coating on the steel surface that greatly improves the subsequent polyester coating adhesion as well as providing corrosion resistance. To promote the effectiveness of the phosphate solution in the catch tank, it is also heated by a gas heater.

The fourth station in the wash system is the ‘stop rinse’ step. A water flusher removes the residual phosphate treating solution to prevent any potential damage to the ‘conversion’ coating.

A final water rinse is sprayed on the metal components in the fifth station. A sealing additive is also added to this rinse station’s tank for additional surface protection. The rinse waters from the fourth and fifth stations constitute the wastewater leaving this process which will be leaving the facility. All other wastewaters are recycled and reused in the rinsing process.

Once the parts have been cleaned and treated in the five-section wash unit, they are passed through a natural gas drying oven. Following this operation, the parts pass through the powder coating process. This process coats metal fencing components with polyester powder that is electro statically applied. This process is a two-step system that consists of 1) cleaning and preparing the metal components for the powder coating and 2) application and curing of a two-part powder coat finish.

The facility's wastewater treatment system (Figure 7) discharges to the local POTW and does not have any contact with stormwater runoff.

1.1.3 Material Storage

The galvanizing line previously located at the rear (western section) of the facility has been removed. North of the old galvanizing area there are also two large propane tanks stored outside in a fenced area. Locked cabinets of small propane containers are stored next to the large aboveground propane tanks. Both containment areas are kept locked when not in use. Along the eastern edge of the property there is a fenced area and tent storage of various pickets and rails.

In front of the previous galvanizing line location is the much larger main manufacturing building. Encompassing the south and southeastern sections of the property, the receiving dock and maintenance areas are to the northern portion of the building. The maintenance area has acetylene and oxygen tank storage. The receiving dock process incoming raw materials and may serve as temporary storage for both metals and chemicals.

The southern portion of the main building contains the ovens (dry-off, batch and cure), batch spray, primer and topcoat areas. Adjacent to the dry-off oven is the multi-stage wash station area.

Raw materials are stored in the receiving dock and the 'warehouse' sections of the main building. These sections are adjacent to each other along the north / northeastern portion of the main building. Some raw materials (unprocessed metal) and finished goods are also stored outdoors near the receiving dock. The unprocessed metals are not a runoff contamination issue. The finished goods do not pose a runoff issue since they are designed for outdoor use.

The facility has a small above ground storage container: one for diesel at 55 gallons.

Table 1.1.3a Containment Analysis

Material	Container Type	Capacity (Gallons)	Secondary Containment	Comments
Diesel	Horizontal, atmospheric	55	Yes - dike	Sufficient

Table 1.1.3b. Construction and Control Analysis

Material	Container Location	Construction Material	Level Alarms? Yes/No	Comments
Diesel	Storage building, exterior	Stainless steel	No ¹	Weekly visual inspections

¹ Sight gauges

Several drums and containers of coolants and oils are located in the storage areas and throughout the facility. Some coolants and oils are stored outside the manufacturing building but under a shed. Portable containers of welding gases are distributed as necessary in areas of use. The main storage area for compressed gases is located near the maintenance shop of the main building. Several flammable cabinets are located inside the manufacturing facility. The cabinets contain various types of chemicals such as paint and spray degreasers. Spill pallets are in use in various areas of the facility for containment.

1.1.4 Waste Storage and Disposal

Hazardous waste is stored in a diked area at the rear of the galvanizing building. All hazardous waste containers are labeled and picked up regularly for off-site disposal. Solid waste is stored in dumpsters located around the property. The solid waste is picked up regularly and transported to a landfill by a waste management company.

The waste from the machining operations includes metal sludge. Once in solid form, this material does not pose a runoff contamination issue and is occasionally stored outside in 55-gallon drums.

Spilled oil is collected in diked areas around certain machines or in reservoirs located beneath the machines. Collected oil is mixed with other used oil around the facility and placed in 55-gallon drums. The used oil is periodically removed for disposal or recycling off-site.

Light bulbs and used batteries are stored separately and sent off-site as universal waste. .

Small spills inside the manufacturing building are cleaned up by production employees in the area or are addressed by maintenance personnel. In the event of a larger chemical spill inside the manufacturing building, personnel will act in accordance with the facility's emergency action plan. Personnel actions will depend upon the type and amount of material spilled. Once personnel safety has been addressed, all attempts will be made to ensure that such spills are contained and not released to the environment. The facility has ongoing internal inspections that address spills throughout the site in order to minimize the quantity, size and adverse effects of any spills of any type of material.

1.1.5 Loading/Unloading Areas

Diesel and propane are delivered via tanker to the facility ASTs. Other chemicals, in 55-gallon drums, totes or smaller containers, are delivered to the receiving dock. Metal pieces and other parts can be unloaded directly for outdoor storage. Drums, totes, and containers of chemicals and oils are delivered and unloaded at the chemical storage building. The site plan in Figure 4 shows the loading/unloading areas.

1.1.6 Site Drainage/Stormwater Controls

The total site area encompasses 23 acres. Approximately 33 percent of this Merchants Metals facility site consists of impervious surfaces. Impervious surfaces include the main manufacturing building, additional process and storage buildings, outside storage areas, asphalt parking lots and driveways located around the plant. The remaining portions of the site are covered by trees and grass.

The facility sits at the top of a hill. Because of this location, surface drainage from the entire Merchants Metals facility flows as sheet flow towards the rear of the facility and downhill to a valley area. On the other side of this valley is a landfill.

All of the stormwater from this property discharges to an unnamed tributary of Fourth Creek. Located in Iredell County, this area is part of the Upper Yadkin watershed (Figure 7).

1.2 Significant Spills

The Merchants Metals facility has had no reportable spills in the last three years.

1.3 Non-Stormwater Certification

The facility and the one outfall was tested for non-stormwater discharges by observing the flow during dry weather. No non-stormwater discharges were observed. A Non-stormwater Discharge Assessment and Certification form is included in Appendix B.

2. STORMWATER MANAGEMENT PLAN

The primary areas of concern at the subject facility are the areas where stormwater may come into contact with industrial activities. Outlined below are some best management practices (BMPs) currently in place at the facility and suggested BMPs to ensure adherence to this plan.

2.1 Best Management Practices

Several best management practices (BMPs) are currently in place at the Merchants Metals facility to reduce the exposure of stormwater to industrial activities. These BMPs are as follows:

- Most chemicals, oils, lubricants and equipment are kept inside the buildings, under a shed or under a canopy (tent).
- Finished goods (such as fencing) that is designed to for use outdoors is sometimes stored outside.
- Maintenance is performed inside the manufacturing building or outsourced when necessary.
- The outside storage area for chemical drums (raw materials and hazardous waste) has a concrete dike.
- Secondary containment is present for the diesel container that is stored outdoors.
- Stormwater is channeled along impervious asphalt driveways and parking lots to prevent erosion.
- Spills and leaks are cleaned up as soon as possible.
- Ongoing site inspections are conducted by facility personnel to minimize spills and the adverse effects of spills.
- Personnel receive spill prevention and material handling training.

Additional BMPs which are recommended for the facility include the following:

- Check equipment that is being stored outside for any oil or chemical leaks. Cover such equipment as necessary.
- Move any parts or materials with minor amounts of oil inside the manufacturing facility or storage building or beneath a tent area.
- Install concrete curbing around the tent area.
- Continue site inspections and update frequency as necessary.
- Install a shed over the outside storage area for hazardous waste and other chemicals.

2.2 Inspection of Stormwater Conveyances

All facility stormwater controls and conveyances will be inspected on a regular basis. A record of these inspections along with any problems identified and any corrective actions taken will be documented and maintained with this SWPPP.

3. PREVENTIVE MAINTENANCE AND GOOD HOUSEKEEPING

3.1 Preventive Maintenance Program

A preventive maintenance program will be implemented at the Merchants Metals facility to provide for early identification and correction of problems that could lead to pollutant discharges into the stormwater system. This program includes identification of areas to be inspected, scheduled inspections of the areas identified, and repair of faulty equipment.

3.1.1 Identification of Equipment and Plant Areas to Inspect

All outdoor process and storage areas as well as loading/unloading areas should be inspected. These areas include the following:

- outside chemical storage
- outdoor shed areas
- aboveground storage area (diesel)
- solid waste dumpsters
- loading docks

The equipment to be inspected in each of these areas include the ASTs, containers of chemicals, sumps, pumps, pipes, valves, drums, and other equipment which has the potential to fail and release oil or chemicals to the stormwater system. Stormwater controls and conveyances will also be inspected. At a minimum, the following items should be observed and noted:

- corroded, damaged or open drums and containers
- corroded or leaking pipes
- leaking or improperly closed valves or fittings
- leaking pumps or hoses
- stained areas near the edges of buildings/concrete floors and pads

3.1.2 Schedule for Preventive Maintenance Inspections

Informal preventive maintenance inspections will be performed on a regular basis by personnel working in the areas identified in section 3.1.1 of this plan. No records of informal inspections will be maintained unless a problem is observed, in which case, a record of the discrepancy and corrective actions taken will be maintained with this plan.

Formal preventive maintenance inspections of all of the areas identified in section 3.1.1 of this plan will be performed on a regular basis by a qualified individual. A record of these inspections along with a discussion of problems identified and corrective measures taken will be maintained with this plan.

3.2 Good Housekeeping Program

A good housekeeping program will be implemented at this Merchants Metals facility to maintain a clean and orderly work environment, which will reduce the potential for accidental spills or mishandling of waste material. All employees will be responsible for implementing and maintaining the good housekeeping program in their respective work areas. The good housekeeping program is divided into three areas: operation and maintenance, material storage practices, and material inventory procedures.

3.2.1 Operation and Maintenance

All floors and ground surfaces will be maintained clean and free of debris. Floors will be kept dry whenever possible. Garbage and other waste material will be placed in the appropriate receptacles in the work areas. Such receptacles will not be overfilled and will be emptied into the ASTs, drums, dumpsters, or trash compactor as required. Equipment and material containers will be well maintained and inspected routinely for leaks or other conditions that could lead to the discharge of chemicals. Spills or leaks will be cleaned up immediately.

3.2.2 Material Storage Practices

All storage areas will be maintained in a manner which minimizes the potential for accidental spills of oil or chemicals. Materials will be stored only in locations designated for storage of that type of material. Adequate aisle space will be provided between rows of stored material to facilitate material transfer and to allow easy access for inspections. Material will be stored away from high traffic areas to reduce accidental releases. Containers will be stacked safely and according to the manufacturers' instructions to avoid damage.

3.2.3 Material Inventory Procedures

An up-to-date materials inventory will be maintained to track how materials are stored and handled onsite and to identify which materials and activities pose the most risk to the environment. All containers including waste material containers will be clearly labeled with the name and type of substance. When containers are emptied and cleaned, the labels will be removed.

4. POLLUTION PREVENTION TEAM

The stormwater pollution prevention team will be responsible for the implementation, maintenance, and, when necessary, the revision of this plan. Members of the pollution prevention team along with an outline of their duties and responsibilities are presented in Appendix C. This table will be updated whenever team members are changed or when the duties and responsibilities of a member are amended.

5. TRAINING

Stormwater pollution prevention training will be provided to personnel involved in activities which have the potential to contaminate stormwater. Record of training activities will be documented. During the training, personnel will be made aware of the contents of this plan and the importance of pollution prevention. Topics covered during training will include:

- spill prevention and response
- preventive maintenance
- good housekeeping
- material management practices

Tools which may be used for this training include films and slide presentations, drills, routine employee meetings, bulletin boards, suggestion programs, and newsletters. A record of the training efforts including the topics covered and a list of the personnel receiving the training will be maintained with this plan for at least one year after coverage of the General Permit.

6. REPORTING AND RECORDKEEPING

Records of spills/releases, inspections, stormwater monitoring, and employee training will be maintained with this plan until at least one year after coverage of the General Permit. For discharges subject to sampling requirements, Merchants Metals is required to retain monitoring information and sampling results for six years from the date of the sampling or for the term of the permit, whichever is greater.

7. FACILITY INSPECTIONS AND STORMWATER SAMPLING

7.1 Facility Inspections

According to General Permit NCG030000, inspections of the facility and all stormwater systems shall occur on a periodic basis. Areas and equipment which have the potential to contribute to a stormwater discharge should still be visually inspected for pollutants entering the drainage system.

The inspections should be performed by a qualified individual familiar with plant operations. The inspections and any subsequent maintenance activities performed should be documented by recording the date and time of inspection, individuals making the inspection, and a narrative of the facility's stormwater control systems and plant equipment. Records of these inspections should be maintained at the facility and placed in Appendix E of this plan.

Documentation of any visual monitoring of stormwater grates and outfalls should also be maintained in Appendix E of this plan. Visual monitoring typically includes a visual description of color, odor, clarity, floating and suspended solids, foam, outfall staining, and visible sheens of water in the stormwater system.

7.2 Stormwater Sampling

Based on the information presented in General Permit NCG030000, the Merchants Metals facility is required to perform semi-annual (grab) sampling for the items listed below at their stormwater discharge outfall.

- Lead (mg/L)
- pH (standard units)
- Oil and Grease (mg/L)
- Total Suspended Solids (mg/L)
- Total Toxic Organics (mg/L)
- Total Rainfall (inches)

8. PLAN AMENDMENT

This plan should be amended whenever there is a change in design, construction, operation, or maintenance which has a significant effect on the potential for the discharge of pollutants to surface waters. The plan should be reviewed and updated, if necessary, on a regular basis.

9. FEASIBILITY STUDY

This facility sits on approximately 23 acres with no current plans to purchase additional land or expand the current manufacturing buildings.

The location of the manufacturing areas at the top of a hill makes further expansion highly unlikely. Nearby property has already been developed by other industrial users and is not likely to be available for purchase by Merchants Metals. Further site changes could encompass the addition of small buildings, but the addition of such buildings would not change the impervious area of this site. There is not enough space on the current property to accommodate a large manufacturing building.

Based on the current information and configuration of this site, it appears that the structures in place are sufficient for stormwater management. Suggestions regarding BMPs and possible improvements are discussed in a separate section of this plan.

10. IMPLEMENTATION

This plan will be implemented immediately at the facility and will include documentation of all monitoring, measurements, inspections, maintenance activities, training provided to employees, and activities to implement BMPs. This documentation will be maintained onsite and made available to SCDHEC personnel upon request. A schedule of the SWPP Plan implementation is presented below:

Required Action	Frequency	Compliance Deadline
Review / Revise SWPPP	Annually ¹	N/A
Record Spills and Leaks	Each occurrence	N/A
Good Housekeeping	Continuously	N/A
Employee Training	Periodically	N/A
Inspections	Periodically	N/A
Sampling and Reporting	Not Required	N/A

Notes:

1 - The SWPPP must be amended whenever there is a change in design, construction, operation, or maintenance which has a significant effect on the potential for the discharge of pollutants to surface waters. Additionally, the SWPPP should be signed whenever it is amended.

N/A – Compliance date is not applicable

APPENDIX A

FIGURES

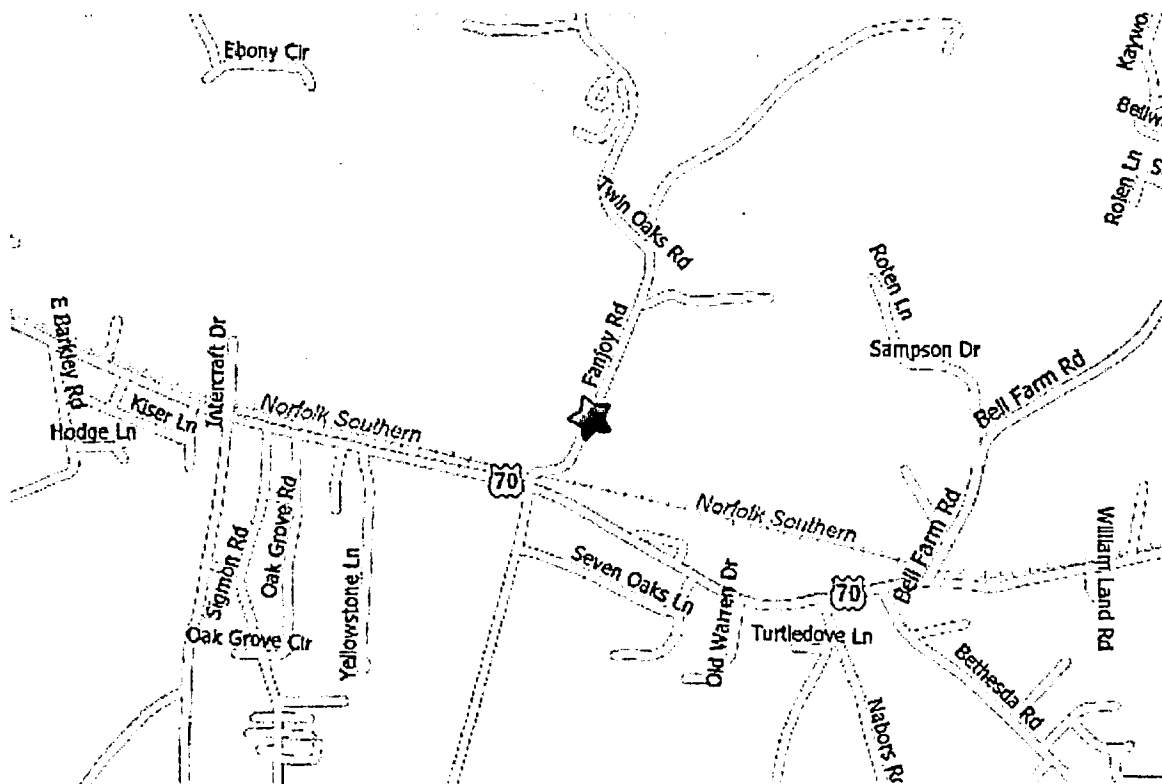


Figure 1. Site location map



Figure 2. Aerial photograph

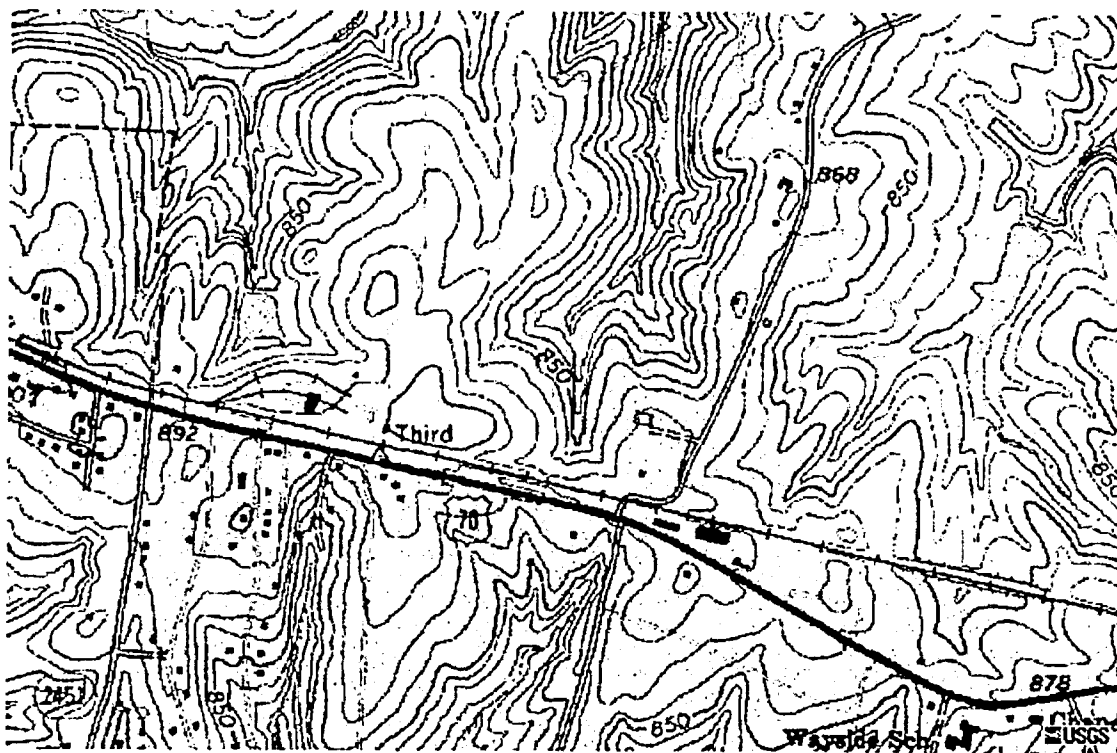


Figure 3. Topography map

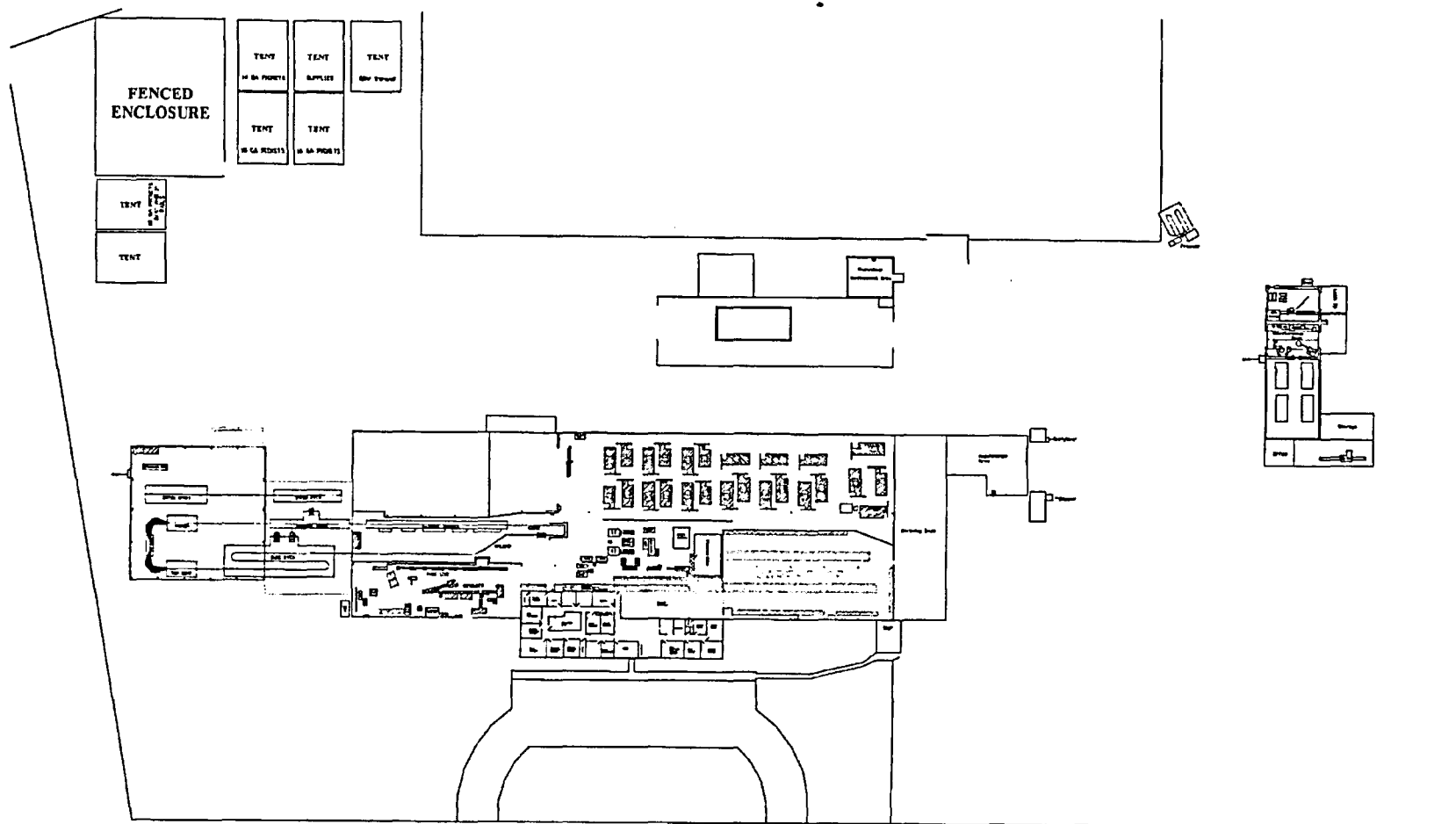


Figure 4. Site map

Landfill



Figure 5 Surface Drainage

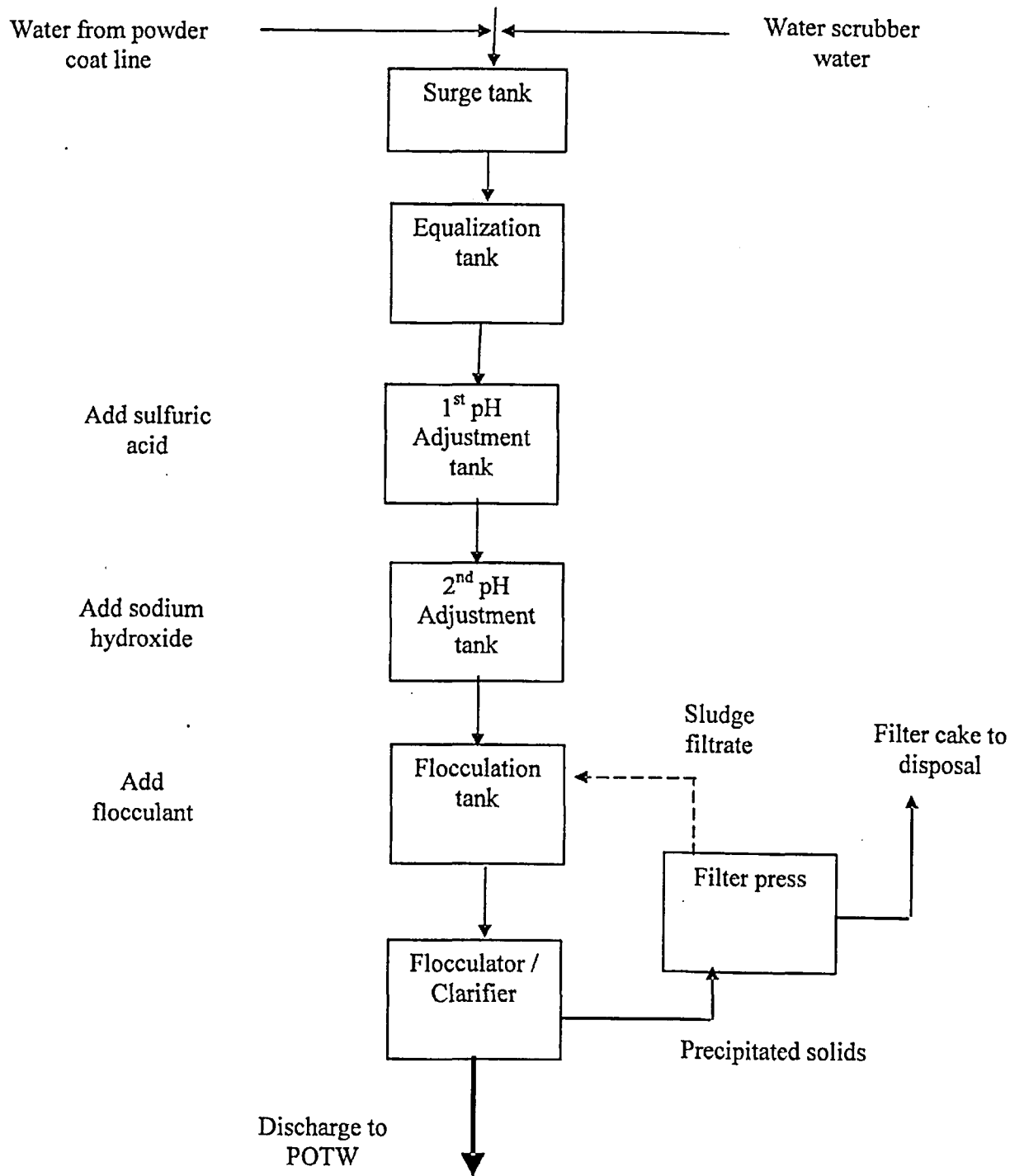


Figure 6. Wastewater treatment system

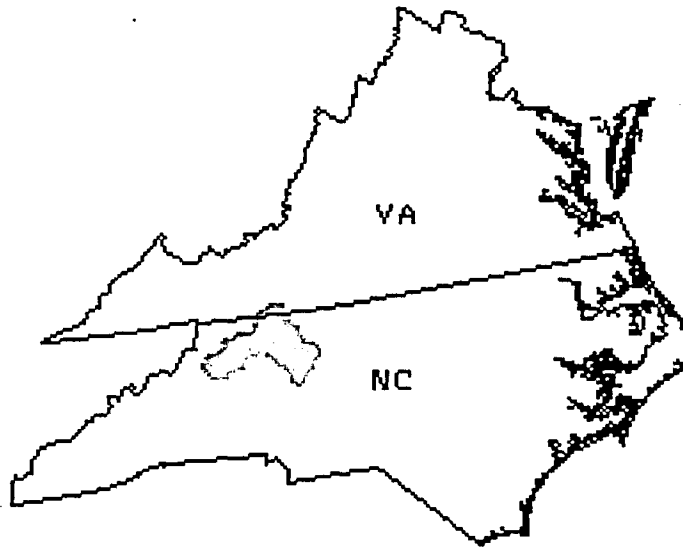


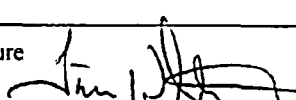
Figure 7. Upper Yadkin Watershed*

* This watershed covers part of NC and VA. Counties included in this watershed: Alleghany, Ashe, Caldwell, Davidson, Davie, Forsyth, Iredell, Rowan, Stokes, Surry, Watauga, Wilkes, Yadkin, Carroll, Grayson, Patrick.

APPENDIX B

NON-STORMWATER DISCHARGE ASSESSMENT AND CERTIFICATION

NON-STORMWATER DISCHARGE ASSESSMENT AND CERTIFICATION				Completed by: Jerry Smith Title: EHS Consultant Date:
Date of Test or Evaluation	Outfall Directly Observed	Method Used to Test or Evaluate Discharge	Describe Results from Test for the Presence of Non-Stormwater Discharge	Identify Potential Significant Sources
4/1/08	OF-01	Visual	No discharge observed	Facility aboveground storage tanks

CERTIFICATION	
<p>I, <u>Tim Williams</u> (responsible corporate official), certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering this information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p>	
A. Name and Official Title (type or print): Tim Williams, HSE Coordinator	B. Area Code and Telephone Number: 704-872-0926
C. Signature 	D. Date Signed 4/8/08

APPENDIX C

POLLUTION PREVENTION TEAM

POLLUTION PREVENTION TEAM

Leader: Tim Williams

Title: HSE Coordinator
Office Phone: 704-872-0926 ext 112
Mobile Phone: 704-902-2950
Pager:
Other:

Responsibilities: Coordinates and implements the requirements of the SWPPP. First contact in the event of a leak or spill.

Member (1): Jerry Smith

Title: EHS Consultant
Office Phone: 336-766-2913
Home Phone: 336-399-0700
Pager:
Mobile Phone: 336-399-0700

Responsibilities: Assists with the implementation of SWPPP requirements. Additional contact in the event of a leak or spill.

Member (2):

Title:
Office Phone:
Home Phone:
Pager:
Mobile Phone:

Responsibilities:

Member (3):

Title:
Office Phone:
Home Phone:
Pager:
Mobile Phone:

Responsibilities:

INDUSTRIAL STORMWATER

FACT SHEET SERIES



U.S. EPA Office of Water
EPA-833-F-06-042
December 2006

Sector AA: Fabricated Metal Products Manufacturing Facilities

What is the NPDES stormwater permitting program for industrial activity?

Activities, such as material handling and storage, equipment maintenance and cleaning, industrial processing or other operations that occur at industrial facilities are often exposed to stormwater. The runoff from these areas may discharge pollutants directly into nearby waterbodies or indirectly via storm sewer systems, thereby degrading water quality.

In 1990, the U.S. Environmental Protection Agency (EPA) developed permitting regulations under the National Pollutant Discharge Elimination System (NPDES) to control stormwater discharges associated with eleven categories of industrial activity. As a result, NPDES permitting authorities, which may be either EPA or a state environmental agency, issue stormwater permits to control runoff from these industrial facilities.

What types of industrial facilities are required to obtain permit coverage?

This fact sheet specifically discusses stormwater discharges from the fabricated metal products manufacturing facilities as defined by Standard Industrial Classification (SIC) Major Groups 34 and 39. Facilities and products in this group fall under the following categories, all of which require coverage under an industrial stormwater permit:

- ◆ Fabricated metal products, except machinery and transportation equipment and cutting (SIC 3411-3499)
- ◆ Jewelry, silverware, and plated ware (SIC 3911-3915)
- ◆ Coating, engraving, and allied services (SIC 3479)

This fact sheet does not cover discharges from establishments not requiring permit coverage including those engaged in manufacturing and rolling of ferrous and nonferrous metals, forgings or stampings, electrolytic, or other processes for refining copper from ore.

What does an industrial stormwater permit require?

Common requirements for coverage under an industrial stormwater permit include development of a written stormwater pollution prevention plan (SWPPP), implementation of control measures, and submittal of a request for permit coverage, usually referred to as the Notice of Intent or NOI. The SWPPP is a written assessment of potential sources of pollutants in stormwater runoff and control measures that will be implemented at your facility to minimize the discharge of these pollutants in runoff from the site. These control measures include site-specific best management practices (BMPs), maintenance plans, inspections, employee training, and reporting. The procedures detailed in the SWPPP must be implemented by the facility and updated as necessary, with a copy of the SWPPP kept on-site. The industrial stormwater permit also requires collection of visual, analytical, and/or compliance monitoring data to determine the effectiveness of implemented BMPs. For more information on EPA's industrial stormwater permit and links to State stormwater permits, go to www.epa.gov/npdes/stormwater and click on "Industrial Activity."

INDUSTRIAL STORMWATER FACT SHEET SERIES

Sector AA: Fabricated Metal Products Manufacturing Facilities

What pollutants are associated with my facility's activities?

Pollutants conveyed in stormwater discharges from facilities involved with the manufacturing of fabricated metal products will vary. There are a number of factors that influence to what extent industrial activities and significant materials can affect water quality.

- ◆ Geographic location
- ◆ Topography
- ◆ Hydrogeology
- ◆ Extent of impervious surfaces (e.g., concrete or asphalt)
- ◆ Type of ground cover (e.g., vegetation, crushed stone, or dirt)
- ◆ Outdoor activities (e.g., material storage, loading/unloading, vehicle maintenance)
- ◆ Size of the operation
- ◆ Type, duration, and intensity of precipitation events

The activities, pollutant sources, and pollutants detailed in Table 1 are commonly found at fabricated metal products manufacturing facilities.

Table 1. Common Activities, Pollutant Sources, and Associated Pollutants at Fabricated Metal Products Manufacturing Facilities

Activity	Pollutant Source	Pollutant
Tool workpiece interface/shaving, chipping	Used metal working fluid with fine metal dust	Total suspended solids (TSS), chemical oxygen demand (COD), oil and grease
Parts/tools cleaning, sand blasting, metal surface cleaning, removal of applied chemicals	Solvent cleaners, abrasive cleaners, alkaline cleaners, acid cleaners, rinse waters Solvents, cold and hot dips, cleaning parts, degreasing	Spent solvents, TSS, acid/alkaline waste, oil Acid, coolants, clean composition, degreaser, mineral spirits, pickle liquor, spent caustic, sludge
Making structural components	Cuttings, scraps, turnings, fines	Metals
Painting operations	Paint and paint thinner spills, sanding, spray painting Empty containers, paint application wastes, spills, over spraying, storage areas	Paints, spent solvents, heavy metals, TSS Paint wastes, thinner, varnish, heavy metals, spent chlorinated solvents
Cleanup of spills and drips	Used absorbent materials	TSS, spilled material
Transportation or storage of materials	Wood dunnage/pallets	BOD, TSS
Metal preparation	Grinding, welding, sawing, shaving, brazing, bending, cutting, etching	Steel scraps, aluminum scraps, brass, copper, dust, chips and borings, steel scale, teflon, manganese
Surface treatment	Finishing, plating, case hardening, chemical coating, coating, polishing, rinsing, abrasive cleaning, electroplating	Acid, aromatic solvent, corn cob, lubricants, sand, oil, pH, nitrates, nitrites, carbon, phosphates, borates, nitrogen, oily sludge, nickel, chromium, hydrofluoric acid
Galvanizing	Spills, leaks, transporting materials	Acid solution, phosphates, zinc chromate, hexavalent chromium, nickel
Heavy equipment use and storage	Leaking fluids, fluids replacement, washing equipment, use on poor surface area, soil disturbance	Oil, heavy metals, organics, fuels, TSS, hydraulic oil, diesel fuel, gasoline
Equipment/vehicle maintenance	Leaking fluids, fluids replacement, washing equipment Vehicle fueling	Oil, grease Gas/diesel fuel, fuel additives

Table 1. Common Activities, Pollutant Sources, and Associated Pollutants at Fabricated Metal Products Manufacturing Facilities (continued)

Activity	Pollutant Source	Pollutant
Storage of uncoated structural steel	Stored on porous pavement	Aluminum, lead, zinc, copper, iron, oxide, oil, nickel, manganese.
Storing galvanized steel directly on the ground	Galvanizing material drippage or leaching	Metals: zinc, nickel, cadmium, chromium.
Vehicle/equipment traffic	Soil disturbance and erosion	TSS from erosion, hydraulic fluid loss/spillage
Cleaning equipment/vehicles	Chemicals disposed improperly, spillage	Oil, grease, surfactants, chromates, acid, hydroxide, nitric acid

What BMPs can be used to minimize contact between stormwater and potential pollutants at my facility?

A variety of BMP options may be applicable to eliminate or minimize the presence of pollutants in stormwater discharges from fabricated metal products manufacturing facilities. You will likely need to implement a combination or suite of BMPs to address stormwater runoff at your facility. Your first consideration should be for pollution prevention BMPs, which are designed to prevent or minimize pollutants from entering stormwater runoff and/or reduce the volume of stormwater requiring management. Prevention BMPs can include regular cleanup, collection and containment of debris in storage areas, and other housekeeping practices, spill control, and employee training. It may also be necessary to implement treatment BMPs, which are engineered structures, intended to treat stormwater runoff and/or mitigate the effects of increased stormwater runoff peak rate, volume, and velocity. Treatment BMPs are generally more expensive to install and maintain and include oil-water separators, wet ponds, and proprietary filter devices.

Measures to control pollutants at metal fabricating operations should focus primarily on the storage of waste and raw materials, chemical storage areas, and equipment storage and service areas. Since most of the operations occur indoors, procedures are often only needed to minimize exposure of pollutants to stormwater runoff in association with the handling and transporting of materials. Of primary importance is the control of activities and use of chemicals that have been identified as potential sources of pollutants.

The most effective discharge controls for these facilities are BMPs targeted toward source control. This includes utilizing inside storage as much as possible and implementing programs for recycling scrap materials. Many of these practices require the use of covers, indoor storage, and indoor operations. Some structural measures would provide an additional control to reduce the potential for exposure at these facilities. These include source reduction diversion dikes, grass swales, vegetative covers, and sedimentation ponds. Preventive controls are typically low in cost and relatively easy to implement, as the majority of the facilities in this industry already employ these practices. In addition, directing flows to privately owned treatment works or retention ponds will be the most effective measure.

The industry also must give consideration to the non-stormwater discharges associated with improper disposal of materials from the indoor processes due to the extensive use of chemicals in the preparation and finishing phases of metal preparation and fabrication. The industry also involves grinding, welding, and sanding operations that will require special consideration to control potential pollutants that could accumulate and be subject to stormwater runoff.

Most of the measures commonly implemented to reduce pollutants in stormwater associated with the fabricated metals industry are generally uncomplicated practices. Some of the practices may be predicated on the size of the operation, the types of processes that are exercised from a full-scale plant operation to a more specialized company that conducts only a portion of the operations usually found in the fabricating industry.

All fabricated metal products facilities should implement BMPs in the following areas of the site:

- ◆ Metal fabricating areas
- ◆ Storage areas for raw metal
- ◆ Receiving, unloading, and loading areas
- ◆ Heavy equipment storage
- ◆ Metal working fluid areas
- ◆ Unprotected liquid storage tanks
- ◆ Chemical cleaners and rinse water
- ◆ Raw steel collection areas
- ◆ Paints and painting equipment
- ◆ Vehicle and equipment maintenance areas
- ◆ Hazardous waste storage areas
- ◆ Transporting chemicals to storage areas
- ◆ Finished products (galvanized)
- ◆ Wooden pallets and empty drums

BMPs must be selected and implemented to address the following:

Good Housekeeping Practices

Good housekeeping is a practical, cost-effective way to maintain a clean and orderly facility to prevent potential pollution sources from coming into contact with stormwater. It includes establishing protocols to reduce the possibility of mishandling materials or equipment and training employees in good housekeeping techniques. Common areas where good housekeeping practices should be followed include trash containers and adjacent areas, material storage areas, vehicle and equipment maintenance areas, and loading docks. Good housekeeping practices must include a schedule for regular pickup and disposal of garbage and waste materials and routine inspections of drums, tanks, and containers for leaks and structural conditions. Practices also include containing and covering garbage, waste materials, and debris. Involving employees in routine monitoring of housekeeping practices has proven to be an effective means of ensuring the continued implementation of these measures.

Minimizing Exposure

Where feasible, minimizing exposure of potential pollutant sources to precipitation is an important control option. Minimizing exposure prevents pollutants, including debris, from coming into contact with precipitation and can reduce the need for BMPs to treat contaminated stormwater runoff. It can also prevent debris from being picked up by stormwater and carried into drains and surface waters. Examples of BMPs for exposure minimization include covering materials or activities with temporary structures (e.g., tarps) when wet weather is expected or moving materials or activities to existing or new permanent structures (e.g., buildings, silos, sheds). Even the simple practice of keeping a dumpster lid closed can be a very effective pollution prevention measure.

Erosion and Sediment Control

BMPs must be selected and implemented to limit erosion on areas of your site that, due to topography, activities, soils, cover, materials, or other factors are likely to experience erosion. Erosion control BMPs such as seeding, mulching, and sodding prevent soil from becoming dislodged and should be considered first. Sediment control BMPs such as silt fences, sediment ponds, and stabilized entrances trap sediment after it has eroded. Sediment control BMPs should be used to back-up erosion control BMPs.

Management of Runoff

Your SWPPP must contain a narrative evaluation of the appropriateness of stormwater management practices that divert, infiltrate, reuse, or otherwise manage stormwater runoff so as to reduce the discharge of pollutants. Appropriate measures are highly site-specific, but may include, among others, vegetative swales, collection and reuse of stormwater, inlet controls, snow management, infiltration devices, and wet retention measures.

A combination of preventive and treatment BMPs will yield the most effective stormwater management for minimizing the offsite discharge of pollutants via stormwater runoff. Though not specifically outlined in this fact sheet, BMPs must also address preventive maintenance records or logbooks, regular facility inspections, spill prevention and response, and employee training.

All BMPs require regular maintenance to function as intended. Some management measures have simple maintenance requirements, others are quite involved. You must regularly inspect all BMPs to ensure they are operating properly, including during runoff events. As soon as a problem is found, action to resolve it should be initiated immediately.

Implement BMPs, such as those listed below in Table 2 for the control of pollutants at fabricated metal product manufacturing facilities, to minimize and prevent the discharge of pollutants in stormwater. Identifying weaknesses in current facility practices will aid the permittee in determining appropriate BMPs that will achieve a reduction in pollutant loadings. BMPs listed in Table 2 are broadly applicable to fabricated metal product manufacturing facilities; however, this is not a complete list and you are recommended to consult with regulatory agencies or a stormwater engineer/consultant to identify appropriate BMPs for your facility.

Table 2. BMPs for Potential Pollutant Sources at Fabricated Metal Products Manufacturing Facilities

Pollutant Source	BMPs
Metal fabricating areas	<ul style="list-style-type: none"> <input type="checkbox"/> Sweep fabrication areas frequently to avoid heavy accumulation of steel ingots, fines, and scrap. <input type="checkbox"/> Absorb dust through a vacuum system to avoid accumulation on roof tops and onto the ground. <input type="checkbox"/> Sweep all accessible paved areas on a regular basis. <input type="checkbox"/> Maintain floors in a clean and dry condition using dry cleanup techniques. <input type="checkbox"/> Remove waste and dispose of regularly. <input type="checkbox"/> Train employees on good housekeeping measures.
Raw material storage areas	<ul style="list-style-type: none"> <input type="checkbox"/> Store materials in a covered area whenever possible. <input type="checkbox"/> Organize storage areas so there is easy access in case of a spill. <input type="checkbox"/> Label stored materials to aid in identifying spill contents. <input type="checkbox"/> Minimize the amount of material stored to avoid corrosive activity from long-term exposed materials. <input type="checkbox"/> Dike or berm the area to prevent or minimize run-on. <input type="checkbox"/> Keep area neat and orderly; stack neatly on pallets or off the ground. <input type="checkbox"/> Cover exposed materials.
Receiving, unloading, and loading areas	<ul style="list-style-type: none"> <input type="checkbox"/> Confine loading/unloading activities to designated areas outside drainage pathways and away from surface waters. <input type="checkbox"/> Close storm drains during loading/unloading activities in surrounding areas.

Table 2. BMPs for Potential Pollutant Sources at Fabricated Metal Products Manufacturing Facilities (continued)

Pollutant Source	BMPs
Receiving, unloading, and loading areas (continued)	<ul style="list-style-type: none"> <input type="checkbox"/> Use a dead-end sump where materials could be directed. <input type="checkbox"/> Inspect containers for leaks or damage prior to loading/unloading. <input type="checkbox"/> Avoid loading/unloading materials in the rain or provide cover or other protection for loading docks. <input type="checkbox"/> Provide diversion berms, dikes or grassed swales around the perimeter of the area to limit run-on. <input type="checkbox"/> Cover loading and unloading areas and perform these activities on an impervious pad to enable easy collection of spilled materials. <input type="checkbox"/> Slope the impervious concrete floor or pad to collect spills and leaks and convey them to proper containment and treatment. <input type="checkbox"/> Provide overhangs or door skirts to enclose trailer ends at truck loading/unloading docks. <input type="checkbox"/> For rail transfer, a drip pan shall be installed within the rails to collect spillage from the tank. <input type="checkbox"/> Where liquid or powdered materials are transferred in bulk to/from truck or rail cars, ensure hose connection points at storage containers are inside containment areas, or drip pans are used in areas where spillage may occur which are not in a containment area. <input type="checkbox"/> Enclose material handling systems. <input type="checkbox"/> Cover materials entering and leaving areas. <input type="checkbox"/> Use dry cleanup methods instead of washing the areas down. <input type="checkbox"/> Regularly sweep area to minimize debris on the ground. <input type="checkbox"/> Provide dust control if necessary. When controlling dust, sweep and/or apply water or materials that will not impact surface or ground water. <input type="checkbox"/> Develop and implement spill prevention, containment, and countermeasure (SPCC) plans. <input type="checkbox"/> Train employees in spill prevention, control, cleanup, and proper materials management techniques.
Heavy equipment storage areas	<ul style="list-style-type: none"> <input type="checkbox"/> Vehicles should be stored indoors when possible. <input type="checkbox"/> If stored outdoors, use gravel, concrete, or other porous surfaces to minimize or prevent heavy equipment from creating ditches or other conveyances that would cause sedimentation runoff and increase TSS loadings. <input type="checkbox"/> Provide covering for outdoor storage areas. <input type="checkbox"/> Divert drainage to the grass swales, filter strips, retention ponds, or holding tanks. <input type="checkbox"/> Direct drainage systems away from high traffic areas into collection systems. <input type="checkbox"/> Clean equipment prior to storage.
Metal working fluid areas	<ul style="list-style-type: none"> <input type="checkbox"/> Store used metal working fluid with fine metal dust indoors. <input type="checkbox"/> Use tight sealing lids on all fluid containers. <input type="checkbox"/> Use straw, clay absorbents, sawdust, or synthetic absorbents to confine or contain any spills. <input type="checkbox"/> Establish recycling programs for used fluids when possible. <input type="checkbox"/> Conduct daily inspections of each machine to identify problems and trends and reduce fluid waste.

INDUSTRIAL STORMWATER FACT SHEET SERIES

Sector AA: Fabricated Metal Products Manufacturing Facilities

Table 2. BMPs for Potential Pollutant Sources at Fabricated Metal Products Manufacturing Facilities (continued)

Pollutant Source	BMPs
Metal working fluid areas (continued)	<ul style="list-style-type: none"> Use pumps, spigots, and funnels when transferring metal working fluid to reduce the amount of lost fluid and the risk of spilling fluids. Fix leaking seals and gadgets to prevent leaks.
Unprotected liquid storage tanks	<ul style="list-style-type: none"> If area is uncovered, connect sump outlet to sanitary sewer (if possible) or an oil/water separator, catch basin filter, etc. If connecting to a sanitary sewer check with the system operator to ensure that the discharge is acceptable. If implementing separator or filter technologies ensure that regular inspections and maintenance procedures are in place. Develop and implement spill plans. Train employees in spill prevention and control. <p>Above ground tanks</p> <ul style="list-style-type: none"> Provide secondary containment, such as dikes, with a height sufficient to contain a spill (the greater of 10 percent of the total enclosed tank volume or 110 percent of the volume contained in the largest tank). If containment structures have drains, ensure that the drains have valves, and that valves are maintained in the closed position. Institute protocols for checking/testing stormwater in containment areas prior to discharge. Use double-walled tanks. Keep liquid transfer nozzles/hoses in secondary containment area. Include overflow protection. <p>Portable containers/drums</p> <ul style="list-style-type: none"> Store drums indoors when possible. Store drums, including empty or used drums, in secondary containment with a roof or cover (including temporary cover such as a tarp that prevents contact with precipitation). Provide secondary containment, such as dikes or portable containers, with a height sufficient to contain a spill (the greater of 10 percent of the total enclosed tank volume or 110 percent of the volume contained in the largest tank). Clearly label drum with its contents.
Chemical cleaners and rinse water	<ul style="list-style-type: none"> Use drip pans and other spill devices to collect spills or solvents and other liquid cleaners. Recycle wastewater. Store recyclable waste indoors or in covered containers. Substitute nontoxic cleaning agents when possible.
Raw steel collection areas	<ul style="list-style-type: none"> Keep collection areas clean. Keep materials in a covered storage bin or inside until pickup. Collect scrap metals, fines, iron dust and store under cover and recycle.
Paints and painting equipment	<ul style="list-style-type: none"> Paint and sand indoors when possible. If done outside, enclose sanding and painting areas with tarps or plastic sheeting. Avoid painting and sandblasting operations outdoors in windy weather conditions. Use tarps, drip pans, or other spill collection devices to contain and collect spills. Use effective spray equipment that delivers more paint to the target and less overspray. Mix paints and solvents in designated areas away from drains, ditches, piers, and surface waters, preferably indoors or under cover.

INDUSTRIAL STORMWATER FACT SHEET SERIES

Sector AA: Fabricated Metal Products Manufacturing Facilities

Table 2. BMPs for Potential Pollutant Sources at Fabricated Metal Products Manufacturing Facilities (continued)

Pollutant Source	BMPs
Paints and painting equipment (continued)	<ul style="list-style-type: none"> Have absorbent and other cleanup items readily available for immediate cleanup of spills. Allow empty paint cans to dry before disposal. Keep paint and paint thinner away from traffic areas to avoid spills. Recycle paint, paint thinner, and solvents. Establish and implement effective inventory control to reduce paint waste, including tracking date received and expiration dates. Use water-based paints when possible. Train employees to use the spray equipment properly.
Metal chip storage areas	<ul style="list-style-type: none"> Store waste chips indoors, if possible. Cover outdoors chip storage containers. Place chip storage containers on asphalt or concrete surfaces. Be sure fluid has completely drained before placing chips in storage containers. Continue draining fluids, if necessary. This can be done as simply as tilting containers towards one end and allowing excess fluids to drain through a hole into a residue container. Inspect area for leaks or spills. Monitor and maintain containers on a regular basis. Empty storage or residue containers and do not allow them to overflow.
Hazardous waste storage areas	<ul style="list-style-type: none"> Cover and/or enclose storage areas (including temporary cover such as a tarp that prevents contact with precipitation). All hazardous waste must be stored in sealed drums. Establish centralized satellite drum-storage areas. Provide secondary containment around chemical storage areas. If containment structures have drains, ensure that the drains have valves, and that valves are maintained in the closed position. Institute protocols for checking/testing stormwater in containment areas prior to discharge. Check for corrosion and leakage of storage containers. Label materials clearly. Properly dispose of outdated materials. Dike or use grass swales, ditches, or other containment to prevent run-on or runoff in case of spills. Post notices prohibiting dumping of materials into storm drains. Store containers, drums, and bags away from high traffic routes and surface waters. Do not stack containers in such a way as to cause leaks or damage to the containers. Use pallets to store containers when possible. Store materials with adequate space for traffic without disturbing drums. Maintain low inventory level of chemicals based on need. Train employees in spill prevention and control and proper hazardous waste management.

Table 2. BMPs for Potential Pollutant Sources at Fabricated Metal Products Manufacturing Facilities (continued)

Pollutant Source	BMPs
Equipment/vehicle maintenance areas	<p>Good Housekeeping</p> <ul style="list-style-type: none"> <input type="checkbox"/> Eliminate floor drains that are connected to the storm or sanitary sewer; if necessary, install a sump that is pumped regularly. <input type="checkbox"/> Prevent spills and drips. <input type="checkbox"/> Use drip pans, drain boards, and drying racks to direct drips back into a sink or fluid holding tank for reuse. <input type="checkbox"/> Drain all parts of fluids prior to disposal. Oil filters can be crushed and recycled. <input type="checkbox"/> Promptly transfer used fluids to the proper container; do not leave full drip pans or other open containers around the shop. Empty and clean drip pans and containers. <input type="checkbox"/> Dispose of greasy rags, oil filters, air filters, batteries, spent coolant, and degreasers properly. <input type="checkbox"/> Label and track the recycling of waste material (e.g., used oil, spent solvents, batteries). <input type="checkbox"/> Maintain an organized inventory of materials. <input type="checkbox"/> Eliminate or reduce the number or amount of hazardous materials and waste by substituting nonhazardous or less hazardous materials. <input type="checkbox"/> Clean up leaks, drips, and other spills without using large amounts of water. <input type="checkbox"/> Prohibit the practice of hosing down an area where the practice would result in the exposure of pollutants to stormwater. <input type="checkbox"/> Clean without using liquid cleaners whenever possible. <input type="checkbox"/> Perform all cleaning at a centralized station so the solvents stay in one area. <input type="checkbox"/> If parts are dipped in liquid, remove them slowly to avoid spills. <input type="checkbox"/> Do not pour liquid waste down floor drains, sinks, outdoor storm drain inlets, or other storm drains or sewer connections. <p>Minimizing Exposure</p> <ul style="list-style-type: none"> <input type="checkbox"/> Perform all cleaning operations indoors or under covering when possible. Conduct the cleaning operations in an area with a concrete floor with no floor drainage other than to sanitary sewers or treatment facilities. <input type="checkbox"/> If operations are uncovered, perform them on concrete pad that is impervious and contained. <input type="checkbox"/> Park vehicles and equipment indoors or under a roof whenever possible and maintain proper control of oil leak/spills. <input type="checkbox"/> Inspect vehicles closely for leaks and use pans to collect fluid when leaks occur. <p>Management of Runoff</p> <ul style="list-style-type: none"> <input type="checkbox"/> Use berms, curbs, grassed swales or similar means to ensure that stormwater runoff from other parts of the facility does not flow over the maintenance area. <input type="checkbox"/> Collect the stormwater runoff from the cleaning area and providing treatment or recycling. Discharge vehicle wash or rinse water to the sanitary sewer (if allowed by sewer authority), wastewater treatment, a land application site, or recycled on-site. DO NOT discharge washwater to a storm drain or to surface water. <p>Inspections and Training</p> <ul style="list-style-type: none"> <input type="checkbox"/> Inspect the maintenance area regularly to insure BMPs are implemented. <input type="checkbox"/> Train employees on proper waste control and disposal procedures.

Table 2. BMPs for Potential Pollutant Sources at Fabricated Metal Products Manufacturing Facilities (continued)

Pollutant Source	BMPs
Vehicle fueling	<ul style="list-style-type: none"> <input type="checkbox"/> Conduct fueling operations (including the transfer of fuel from tank trucks) on an impervious or contained pad or under a roof or canopy where possible. Covering should extend beyond spill containment pad to prevent rain from entering. <input type="checkbox"/> When fueling in uncovered area, use a concrete pad (not asphalt - not chemically resistant to the fuels being handled). <input type="checkbox"/> Use drip pans where leaks or spills of fuel can occur and where making and breaking hose connections. <input type="checkbox"/> Use fueling hoses with check valves to prevent hose drainage after filling. <input type="checkbox"/> Use spill and overflow protection devices. <input type="checkbox"/> Cleanup spills and leaks immediately. <input type="checkbox"/> Minimize/eliminate run-on onto fueling areas. <input type="checkbox"/> Collect stormwater runoff and provide treatment or recycling. <input type="checkbox"/> Use dry cleanup methods for fuel area rather than hosing the fuel area down. Sweep up absorbents as soon as spilled substances have been absorbed. <input type="checkbox"/> Regularly inspect and perform preventive maintenance on storage tanks to detect potential leaks before they occur. <input type="checkbox"/> Inspect the fueling area for leaks and spills. <input type="checkbox"/> Provide curbing or posts around fuel pumps to prevent collisions from vehicles. <input type="checkbox"/> Discourage "topping off" of fuel tanks. <input type="checkbox"/> Train personnel on vehicle fueling BMPs.
Vehicle and equipment cleaning	<ul style="list-style-type: none"> <input type="checkbox"/> Designate vehicle and equipment wash areas that drain to recycle ponds or process wastewater treatment systems. <input type="checkbox"/> Conduct vehicle washing operation indoors or in a covered area. <input type="checkbox"/> Clean washwater residue from portions of the site that drain to stormwater discharges. <input type="checkbox"/> Train employees on proper procedure for washing vehicles and equipment including a discussion of the appropriate location for vehicle washing.
Transporting chemicals to storage areas	<ul style="list-style-type: none"> <input type="checkbox"/> Store drums as close to operational building as possible. <input type="checkbox"/> Label all drums with proper warning and handling instructions. <input type="checkbox"/> Forklift operators should be trained to avoid puncturing drums.
Finished products (galvanized) storage	<ul style="list-style-type: none"> <input type="checkbox"/> Store finished products indoors, on a wooden pallets concrete pad, gravel surface, or other impervious surface.
Wooden pallets and empty drums	<ul style="list-style-type: none"> <input type="checkbox"/> Clean contaminated wooden pallets. <input type="checkbox"/> Cover empty drums. <input type="checkbox"/> Cover contaminated wooden pallets. <input type="checkbox"/> Store drums and pallets indoors. <input type="checkbox"/> Clean empty drums. <input type="checkbox"/> Store pallets and drums on concrete pads.

What if activities and materials at my facility are not exposed to precipitation?

The industrial stormwater program requires permit coverage for a number of specified types of industrial activities. However, when a facility is able to prevent the exposure of ALL relevant activities and materials to precipitation, it may be eligible to claim no exposure and qualify for a waiver from permit coverage.

If you are regulated under the industrial permitting program, you must either obtain permit coverage or submit a no exposure certification form, if available. Check with your permitting authority for additional information as not every permitting authority program provides no exposure exemptions.

Where do I get more information?

For additional information on the industrial stormwater program see www.epa.gov/npdes/stormwater/msgp.

A list of names and telephone numbers for each EPA Region or state NPDES permitting authority can be found at www.epa.gov/npdes/stormwatercontacts.

References

Information contained in this Fact Sheet was compiled from EPA's past and present Multi-Sector General Permits and from the following sources:

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- ◆ Washington State Department of Ecology. 1999. Metal Machining Sector: A Pollution Prevention Assessment and Guidance. Publication #99-412.
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